

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 LAILA RAIS *fka* MASUD, #311731
lmasud@marshackhays.com
3 **MARSHACK HAYS WOOD LLP**
870 Roosevelt
4 Irvine, California 92620
Telephone: (949) 333-7777
5 Facsimile: (949) 333-7778

6 General Counsel for Chapter 11 Trustee,
RICHARD A. MARSHACK

8 UNITED STATES BANKRUPTCY COURT
9 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA

10 In re
11 THE LITIGATION PRACTICE GROUP P.C.,
12 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

SECOND AND FINAL APPLICATION
FOR ALLOWANCE OF FEES AND
COSTS FILED BY MARSHACK HAYS
WOOD LLP AS GENERAL COUNSEL;
MEMORANDUM OF POINTS AND
AUTHORITIES; AND DECLARATION
OF D. EDWARD HAYS IN SUPPORT

Hearing:

Date: January 14, 2025

Time: 10:00 a.m.

Ctrm: 5C - ViaZoom

Place: 411 West Fourth Street
Santa Ana, CA 92701

20 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY COURT
21 JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED
22 PARTIES:

23 Marshack Hays Wood LLP (“Firm”) respectfully submits this Second and Final Application
24 for Allowance of Fees and Costs (“Application” or “Second Application”).¹ The Firm represents
25 Richard A. Marshack, in his capacity as Chapter 11 Trustee (“Trustee”) for the Bankruptcy Estate
26 (“Estate”) of The Litigation Practice Group, P.C. (“Debtor”), as the Estate’s general counsel. This

27
28 ¹ All further payments to the Firm for fees and expenses incurred will be paid pursuant to the terms
of the Liquidating Trust. *See* Dk. No. 1646.

1 Application encompasses services rendered and expenses paid or incurred from August 1, 2024,
2 through and including September 23, 2024 (“Second Reporting Period”).² By this Application, the
3 Firm seeks allowance of \$340,416 in fees and \$2,224.32 for reimbursement of costs, for a total
4 award of \$342,640.32 pursuant to 11 U.S.C. §§ 330 and 331, and allowance of these and prior
5 approved interim compensation on a final basis.

6 The Firm’s first interim application (“First Application”) covered the period of April 20,
7 2023, through and including July 31, 2024 (“First Reporting Period”). The First Application sought
8 allowance of \$1,332.851 in professional fees and \$46,897.69 for reimbursement of expenses for the
9 First Reporting Period. On October 1, 2024, as Dk. No. 1778, the Court entered an order granting the
10 First Application to the Firm for total amount allowed of \$1,332,352 for interim fees, and
11 \$46,897.69 of interim expenses (“First Interim Order”).³ Based on the First Interim Order, the Firm
12 was paid interim fees of \$1,139,160.96, and interim costs of \$46,897.69, leaving a remaining
13 balance of \$193,191.04 in fees and \$0 in costs.

14 Overall, the Firm seeks allowance of its total requested fees and costs in the amount of
15 \$342,640.32, on a final basis, and for Court approval to pay all of the allowed fees and costs on a
16 final basis, in connection with Trustee’s final report.

17 **1. Introductory Statement**

18 A bankruptcy court may approve compensation if services are reasonable and beneficial to
19 the Estate. In this case, the Firm represented the Trustee as his general counsel. With the Firm’s
20 assistance, the Trustee’s significant efforts prevented creditors from receiving nothing after LPG and
21 its principals engaged in fraudulent asset transfers to avoid lawsuits. During the First Reporting
22 Period, the Trustee recovered client files, managed operations lawfully, sold assets to third-party
23 buyers, and ensured compliance with consumer protection laws through a monitor. Importantly, the
24 Trustee collaborated with the Official Committee of Unsecured Creditors on a Chapter 11 plan,
25 which the Court confirmed on August 29, 2024. During this Second Reporting Period, the Trustee
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27 ² Some charges from the First Reporting Period which were inadvertently left off the First
28 Application are included in this Application.

³ A true and correct copy of the First Interim Order is attached as **Exhibit 2**, to the declaration of D.
Edward Hays (“Hays Declaration”).

1 with the assistance of the Firm, (1) moved forward with implementing the terms of the confirmed
2 Plan; and (2) continuing investigation into numerous avoidance actions with some settlements
3 reached.

4 The services rendered by the Firm were necessary, reasonable, and beneficial to the estate.
5 The Firm's efforts have resulted in significant recoveries for the Estate and as the Trustee's
6 avoidance actions continue, creditors of the Liquidating Trust will receive distributions on account
7 of their claims. None of this would have been possible without the Trustee and his retained
8 professionals undertaking significant risks to provide benefit to creditors. The Firm respectfully
9 requests that the Court approve its fees of \$340,416 and costs of \$2,224.32.

10 **2. Local Bankruptcy Rule 2016-1 Requirements**

11 Pursuant to Rule 2016-1 of the Local Bankruptcy Rules ("LBR"), here follows a detailed
12 narrative history and report concerning the status of the case. The factual history is set forth on the
13 following pages of this Application and is subdivided into categories which summarize the services
14 rendered. Should any additional information be requested by the Court, the Office of the United
15 States Trustee, the Fee Examiner, or any party in interest, the Firm will provide a supplemental
16 declaration prior to the hearing on this Application.

17 **A. Procedural Background – LBR 2016-1(A)(1)(A)**

18 The Firm's first interim Application which covered the period of April 20, 2023, through and
19 including July 31, 2024, was filed on September 3, 2024, as Dk. No. 1617 ("First Application"). The
20 Firm hereby incorporates the narrative history provided in its First Application. *See*, LBR 2016-
21 1(a)(iv). During the Second Reporting Period, the following narrative details significant events.,
22 including progress made toward substantial consummation of the plan.

23 **i. Administrative Claims**

24 **a. Administrative Claim Appeals**

25 On August 27, 2024, the Court denied the administrative expense motions of Han Trinh (Dk.
26 No. 674) seeking \$136,280.56, Phuong (aka Jayde) Trinh (Dk. No. 675) seeking \$114,825.14, and
27 Greyson Law Center, PC (Dk. No. 676) seeking \$5,434,633.00. The Court entered the following
28 Orders denying the administrative claims: Han Trinh ("Han") as Dk. No. 1548; Phuong (aka Jayde)

Trinh (“Jayde”) as Dk. No. 1547; and Greyson Law Center, PC (“Greyson”) as Dk. No. 1546. On September 9, 2024, Han, Jayde, and Greyson each filed Notices of Appeal and Statements of Election to Bankruptcy Appellate Panel (“Admin Claim Appeals”). On September 7, 2024, the Trustee filed his Statements of Election to Proceed in U.S. District Court for all three Admin Claim Appeals. Currently, the Admin Claim Appeals are assigned the following case numbers: *Han Trinh v. Richard A. Marshack, Chapter 11 Trustee*: 8:24-cv-02077-FMO (“Han Appeal”); *Phuong Jayde Trinh v. Richard A. Marshack, Chapter 11 Trustee*: 8:24-cv-02243-FMO (“Jayde Appeal”); and *Greyson Law Center, PC v. Richard A. Marshack, Chapter 11 Trustee*: 8:24-cv-02074-FMO (“Greyson Appeal”).

b. Pending Administrative Claim Motions

Currently, there are three administrative expense motions that remain pending to which the Trustee’s response has been extended. The motions are set for hearings on December 5, 2024, and Trustee’s responses are due November 21, 2024. Trustee’s position on the remaining three administrative expense has remained unchanged since the filing of the August 15, 2024, status report:

United Partnership, Dk. No. 671: United Partnerships (“UP”) seeks \$178,665.70 for providing leads and customer retention services to Debtor. The Trustee has concluded that he must oppose the motion because UP has not yet been able to provide any evidence that its claim arose from a post-petition transaction *with the Debtor* that directly and substantially benefitted the estate. The Trustee has agreed to continue the hearing on the Motion and modify the briefing schedule to provide UP with additional time to investigate and provide proof in support of its claim. Specifically, on August 26, 2024, as Dk. No. 1543, the Trustee filed a stipulation with UP, to modify briefing scheduled and continue hearing on motion for allowance of administrative expenses claim (“UPL Stipulation”). On August 28, 2024, as Dk. No. 1561, the Court entered an order granting the UPL Stipulation.

Herret Credit Consultants, Dk. No. 708: Herret Credit Consultants (“Herret”) seeks \$450,000.00 for post-petition services allegedly managing 65,000 consumer clients and a myriad of LPG affiliate firms. The Trustee has concluded that he must oppose the motion because UP has not

1 yet been able to provide any evidence that its claim arose from a post-petition transaction *with the*
2 **Debtor** (and not non-Debtor entities that received fraudulent transfers of the Debtor’s assets) that
3 directly and substantially benefitted the estate. The Trustee has agreed to continue the hearing on the
4 Motion and modify the briefing schedule on the Motion to allow Herret time to complete its
5 investigation and attempt to meet its burden of proof. Specifically, on August 28, 2024, as Dk. No.
6 1559, the Trustee filed a stipulation with Herret, to continue hearing on motion for allowance of
7 administrative expenses claim (“Herret Stipulation”). On August 28, 2024, as Dk. No. 1560, the
8 Court entered an order granting the Herret Stipulation.

9 Alteryx, Dk. No. 750: Alteryx seeks \$703,089.94 based on a March 2022 sublease
10 agreement between Alteryx and Innovative Solutions, Inc. (“Innovative”) for property located at
11 3345 Michelson Drive, Suites 400 and 490, and 3347 Michelson Drive, Suite 400 in Irvine, CA
12 (“Alteryx Property”). The Debtor was not a party to the sublease and did not receive any benefit in
13 return for providing (1) a guaranty and (2) an irrevocable letter of credit (“LOC”) in the amount of
14 \$409,206.31 to Alteryx as part of Innovative’s sublease. The Trustee prepared an adversary
15 proceeding against Alteryx (“Alteryx Adversary”) which would seek avoidance and recovery of
16 fraudulent transfers including the cancellation of LPG’s guaranty, its pledge of cash in support of the
17 LOC which Alteryx has completely exhausted, and over \$1 million of payments made on account of
18 obligations under the sublease. After preparation of the Alteryx Adversary, because the stated
19 amount in controversy exceeds \$1,000,000, pursuant to Section 2.10(c)(i) of the Liquidation Trust
20 Agreement included in the Plan, the Trustee obtained consent of the Post-Confirmation Committee⁴
21 to make a counteroffer to Alteryx which was accepted. The Trustee is in the process of documenting
22 the proposed agreement pursuant to which Alteryx will waive any administrative claim against the
23 estate and pay the estate substantial funds to settle the avoidance claims.

24 **c. Improperly Designated Administrative Claims**

25 The Trustee identified 70 parties that filed proofs of claim marking the box stating it was an
26

27 ⁴ Post-Confirmation Committee is defined in Section 2.10(a) of the Liquidation Trust Agreement as
28 the oversight board formed on the Effective Date after the Official Committee of Unsecured
Creditors is dissolved.

1 administrative claim entitled to administrative priority status under 11 U.S.C. §503(b)(9) or as a
2 broader administrative claim under 11 U.S.C. §503(b). After a thorough review of these proofs of
3 claim and the evidence attached to them, the Trustee determined that these proofs of claims were not
4 entitled to administrative priority. On September 24, 2024, the Trustee filed an Omnibus Objection
5 to Proofs of Claim Filed for Alleged Administrative Claims as Dk. No. 1747 (“Omnibus Objection
6 to Alleged Admin Claims”). The total amount of the Omnibus Objection to Alleged Admin Claims
7 is at least \$849,841.16.⁵ Section 503(b)(9) provides an administrative claim for “the value of goods
8 received by the debtor within 20 days *before* the date of the commencement of a case under this title
9 in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.” 11
10 U.S.C. § 503(b)(9) (emphasis added). Here, review of the Claims shows that all but four of the
11 Alleged Admin Claimants checked the 503(b)(9) box improperly. The Alleged Admin Claimants
12 that checked the § 503(b)(9) on their respective POC appear to be former legal services customers of
13 the Debtor and did not provide any goods to the Debtor before the commencement of this case.
14 These appear to be mistaken and improper designations and the Trustee objects to treatment of
15 Objected Claims as administrative expenses. The Trustee, however, does not seek to disallow the
16 claims in their entirety. Instead, the Trustee requests that the claims be reclassified as general
17 unsecured claims. The hearing on the Administrative Claim Objection is scheduled for November
18 14, 2024. The hearing on the Omnibus Objection to Alleged Admin Claims is set on November 14,
19 2024.

20 **ii. Trustee’s Filed Objections to Claims**

21 The Trustee has been investigating and verifying proofs of claims that have been filed with
22 the bankruptcy court and with the Court-approved claims agent, Omni Agent Solutions (“Omni”)
23 and filing appropriate objections. In addition to filing the Omnibus Objection to Alleged Admin
24 Claims (*supra*), the Trustee filed the following objections.

25 On September 20, 2024, the Trustee filed Omnibus Objection to Alleged 11 U.S.C.
26 §507(A)(4) Priority Claims that Exceed Statutory Cap naming six claimants whose proofs of claims
27

28 ⁵ Some of the proofs of claim did not properly indicate the amount of the administrative claim and
are therefore not included in this total.

1 exceeded the statutory cap pursuant to §507(A)(4) (“Stat Cap Objection I”) as Dk. No. 1715.
2 Objected Statutory Cap Claims assert a § 507(a)(4) priority claim exceeding the \$15,150 statutory
3 cap. As such, the 507(a)(4) Objected Claims must be modified to include at most a \$15,150 priority
4 portion under § 507(a)(4), with the balance of the claims to be reclassified as general unsecured
5 claims (unless priority is alleged pursuant to another section). The hearing on Stat Cap Objection I is
6 currently set on November 14, 2024.⁶

7 On September 20, 2024, the Trustee filed Omnibus Objection to Alleged 11 U.S.C.
8 §507(A)(4) Priority Wage Benefit Claims filed by Non-Employees (“Non-Employee Wage
9 Objection”) as Dk. No. 1717. 507(a)(4) Wage Benefit Objected Claims assert § 507(a)(4) priority.
10 But, Debtor’s payroll records neither reflect that any of the Claimants were employees of the Debtor
11 nor do the 507(a)(4) Wage Benefit Objected Claims attach any evidence that any of the Claimants
12 were employees of the Debtor. To the contrary, most of the 507(a)(4) Wage Benefit Objected Claims
13 evidence, on their face, that the claims arise from work performed for companies other than the
14 Debtor. As such, the 507(a)(4) Wage Benefit Objected Claims must be disallowed in their entirety.
15 Alternatively, the Trustee objected any portion of the claims being afforded § 507(a)(4) priority for
16 amounts exceeding the \$3,350 statutory cap, with the amounts in excess of the cap being reclassified
17 as general unsecured claims (unless priority is alleged pursuant to another section). The hearing on
18 Non-Employee Wage Objection is set on November 14, 2024.

19 On September 20, 2024, the Trustee filed Objection to the Claims Filed by Olga Lucia
20 Esquivel (“Esquivel Objection”) as Dk. No. 1719 which proposes disallowing 14 claims totaling
21 \$170,895.95 filed by Olga Esquivel. Although the Esquivel Claims assert § 507(a)(4) priority,
22 thirteen of the fourteen claims (Claim Nos. 95, 175, 443, 1221, 1933, 2035, 2219, 100111, 100126,
23

24 ⁶ On October 18, 2024, the Court approved Trustee’s stipulation with Jennifer Ann McLaughlin
25 (“McLaughlin”), one of the claimants named in Stat Cap Objection I. The order, entered as Dk. No.
26 1843, caps the McLaughlin priority portion at \$15,150 and reclassified \$3,764.77 as an unsecured
27 claim and vacated the November 14, 2024, hearing as to McLaughlin only. Separately, on June 20,
28 2024, as Dk. No. 1363, Jennifer Ann McLaughlin filed a Verified Motion for Administrative
Expense Under Rule 9006(b)(1) seeking an administrative claim in the amount of \$10,769.22
29 (“McLaughlin Motion”). On August 26, 2024, as Dk. No. 1539, the Trustee filed a stipulation with
McLaughlin, regarding treatment of administrative claim sought by motion (“McLaughlin
Stipulation”) allowing a reduced administrative claim in the amount of \$4,615.38. On August 26,
2024, as Dk. No. 1540, the Court entered an order granting the McLaughlin Stipulation.

1 100127, 100286, 100359, and 101298) are for alleged post-petition services and are, on their face,
2 outside the time period entitled to priority under § 507(a)(4). The claims also do not qualify as
3 administrative claims. The remaining claim (Claim No. 94) asserts a pre-petition claim within the
4 statutory limit but does not include or attach any documentation to establish that it is for unpaid
5 wages earned within 180 days before the Petition Date as required for any priority by § 507(a)(4).
6 The hearing on Esquivel Objection is set on November 14, 2024.

7 On September 20, 2024, the Trustee filed Omnibus Objection to Duplicative Priority Proofs
8 of Claims (“Duplicative Claims Objection”) as Dk. No. 1728. Each of the claims identified in the
9 Duplicate Objection are a duplicate of a previously-filed proof of claim. The hearing on Duplicative
10 Claims Objection is set on November 14, 2024.

11 On October 3, 2024, the Trustee filed Objection to Priority Claim No. C 571-101407 filed by
12 Alexandria Marie Campos for Exceeding the Statutory Cap (“Stat Cap Objection II”) as Dk. No.
13 1783. The hearing on Stat Cap Objection II is set on December 5, 2024.

14 On October 3, 2024, the Trustee filed Objection to Alleged Priority Claim No. 2410-1 Filed
15 by Alexis Johnson That Exceeds the Statutory Cap (“Stat Cap Objection III”) as Dk. No. 1784. The
16 hearing on Stat Cap Objection III is set on December 5, 2024.

17 On October 3, 2024, the Trustee filed Omnibus Objection to Alleged Priority Claims that
18 Lack Evidence Supporting Priority Status (“Non-Evidenced Priority Objection”) as Dk. No. 1785.
19 The hearing on Non-Evidenced Priority Objection is set on December 5, 2024.

20 **iii. Compromise Motion with Blue Cross of California dba Anthem Blue**
21 **cross**

22 On June 7, 2023, Anthem (“Anthem”) filed a proof of claim asserting a \$164,443.32 priority
23 unsecured claim pursuant to 11 U.S.C. § 501(a)(5), which was docketed on the Court’s Claims
24 Register as Claim No. 64-1 (the “Original Anthem Claim”). On October 6, 2023, Anthem filed an
25 amended proof of claim asserting a \$201,869.92 priority unsecured claim pursuant to 11 U.S.C.
26 § 501(a)(5), which was docketed on the Court’s Claims Register as Claim No. 64-2 (the “Amended
27 Anthem Claim” or “Anthem Claim”). The Amended Anthem Claim supersedes and replaces the
28 Original Anthem Claim.

1 The Claim provides that it is based on a contract (“Policy”) between Anthem and the Debtor
2 under which Anthem provided group health insurance coverage to Debtor’s eligible employees and
3 their eligible dependents, in exchange for the payment of a monthly premium. Anthem specifically
4 alleges that before the March 20, 2023, petition date, Debtor failed to pay in full the monthly
5 premiums due under the Policy for February and March 2023.

6 On August 27, 2024, as Dk. No. 1549, Trustee filed a Motion to Approve Compromise
7 Under Rule 9019 Between Trustee and Anthem (“Anthem Compromise”). At the August 29, 2024,
8 hearing on the Anthem Compromise, the Court determined the compromise could be approved, and
9 therefore on September 9, 2024, as Dk. No. 1650, the Court entered an order granting the Anthem
10 Compromise.

11 **iv. Azzure Capital Litigation Status, Mediation, and Cash Collateral Motion**

12 Prepetition, Azzure made a secured loan to Debtor in the total principal amount of \$2.55
13 million. Azzure contends that the amount due under this loan now exceeds \$5 million (“Azzure
14 Loan”). The Trustee disputes the amount owed on multiple grounds including, but not limited to,
15 whether the embedded annual 170% fixed interest rate in the Loan is enforceable against Debtor
16 under California law and whether the lien purportedly perfected by the assignment of a previously-
17 filed UCC-1 to Azzure. In order to resolve the disputes, the parties entered into an agreement.

18 On August 16, 2023, Dk. No. 392, Trustee filed a Motion to Approve Compromise Under
19 Rule 9019 Between Trustee and Azzure Capital LLC. At the September 13, 2023, hearing on the
20 Azzure Compromise, the Court determined the compromise could not be approved, and therefore
21 on October 17, 2023, as Dk. No. 518, the Court entered an order denying the Azzure Compromise,
22 without prejudice. On October 31, 2023, as Dk. No. 611, the Trustee filed a Motion to Reconsider
23 the Azzure Compromise (“Reconsideration Motion”). On November 29, 2023, as Dk. No. OHP-
24 CDR, LP (“OHP”) filed an opposition to the Motion. On December 6, 2023, as Dk. No. 752, trustee
25 filed a reply in support of the Reconsideration Motion. On December 13, 2023, the court held a
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1 hearing on the Reconsideration Motion wherein it denied the Reconsideration Motion.⁷ Litigation
2 against Azzure continued and the parties have now agreed to participate in mediation.

3 To facilitate confirmation of the Plan and settlement discussions, Azzure agreed that the
4 Trustee may use cash subject to its disputed secured claim in exchange for a replacement lien to
5 attach to the Estate's future assets including litigation recoveries to protect against any diminution in
6 value of the collateral securing such disputed secured claim. On August 16, 2024, as Dk. No. 1518,
7 the Trustee filed a motion to approve stipulation between Trustee, Committee and Azure for
8 (1) Consent to Use of Disputed Cash Collateral; and (2) Replacement Lien ("Azzure Stipulation
9 Motion"). On August 28, 2024, as Dk. No. 1564, the Court entered an order granting the Azzure
10 Stipulation Motion.

11 **3. Status of Administration– LBR 2016-1(a)(1)(A)(ii)**

12 Pursuant to LBR 2016-1(a)(1)(A)(ii), "applicant must report the status of administration of
13 the estate, discussing the actions taken to liquidate property of the estate, the property remaining to
14 be administered, the reasons the estate is not in a position to be closed, and whether it is feasible to
15 pay an interim dividend to creditors."

16 The Trustee has not yet completed his investigation of claims against the Debtor's insiders
17 and third parties, with several avoidance actions in their infancy and not yet filed. Under the terms of
18 the Plan, the assets of the Estate will be transferred to the Liquidating Trust which will administer
19 them and make distributions to creditors as set forth in the Plan and Liquidating Trust.

20 **A. Funds on Hand in the Estate – LBR 2016-1(a)(1)(A)(iii)**

21 Pursuant to LBR 2016-1(a)(1)(A)(iii), "applicant must disclose the amount of money on
22 hand in the estate and the estimated amount of other accrued expenses of administration."

23 As of the filing of this Application, the Estate has approximately \$2,040,084.28 on hand.
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28 ⁷ This has spawned litigation that is described below in the section titled Secured Creditor.

B. Employment of the Firm – LBR 2016-1(a)(1)(B)

Pursuant to LBR 2016-1(a)(1)(B), the Application must include “the date of entry of the order approving the employment of the individual or firm for whom payment of fees or expenses is sought, and the date of the last fee application for the professional.”

On May 19, 2023, as Dk. No. 75, Trustee filed an application to employ the Firm as general counsel (“Employment Application”).

On June 22, 2023, as Dk. No. 129, the Court entered the Employment Order. A true and correct copy of the Employment Order is attached to the Hays Declaration as **Exhibit 1**.

C. Previous Fees and Expenses – LBR 2016-1(a)(1)(C)

Pursuant to LBR 2016-1(a)(1)(C), the Application must include “a listing of the amount of fees and expenses previously requested, those approved by the court, and how much has been received.”

The Firm’s first interim Application covered the period of April 20, 2023, through and including July 31, 2024. The original amount of fees and costs requested by the Firm totaled \$1,379,748.69. On October 1, 2024, as Dk. No. 1778, the Court entered an order granting the distribution to the Firm for total amount allowed of \$1,332,352 for interim fees, and \$46,897.69, of interim expenses (“Fee App Order”). A true and correct copy of the Fee App Order is attached to the Hays Declaration as **Exhibit 2**.

The Firm has received interim payments on account of its allowed fees in the amount of \$1,139,160.96 in fees and \$46,897.69 in expenses, leaving an unpaid balance of \$193,191.04 under the first interim fee application.

D. Description of Services Rendered – LBR 2016-1(a)(1)(D)

Pursuant to LBR 2016-1(a)(1)(D), the Application must include “a brief narrative statement of the services rendered and the time expended during the period covered by the application.”

The Reporting Period is August 1, 2024, through and including September 23, 2024. During this approximate 2-month period, the Firm provided 657 hours of services for the benefit of the Estate. The Firm’s blended hourly rate for all services provided to the Estate as set forth in this Application is \$518. Descriptions of the types of services rendered by the Firm are set forth below

pursuant to the categories recommended by the Office of the United States Trustee.

i. OHP Adversary Action (23-01098)

The Firm spent .80 hours on OHP Adversary Action (23-01098), resulting in fees of \$592, which is less than 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$740. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

ii. Marshack v. Diab (23-01046)

The Firm spent 3.60 hours on Marshack v. Diab (23-01046), resulting in fees of \$2,317, which is 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$644. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

iii. Han Trinh (24-02077)

The Firm spent 1.40 hours on Han Trinh (24-02077), resulting in fees of \$681, which is less than 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$486. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

iv. Jayde Trinh (24-02243)

The Firm spent .50 hours on Jayde Trinh (24-02243), resulting in fees of \$186, which is less than 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$372. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

v. Greyson (24-02074)

The Firm spent 2.50 hours on Greyson (24-02074), resulting in fees of \$406, which is less than 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$162. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

1 **vi. Asset Analysis and Recovery**

2 The Firm spent 10.70 hours on Asset Analysis and Recovery, resulting in fees of \$5,275,
3 which is 2% of the total fees sought by the Application. The blended hourly rate for these services is
4 approximately \$493. Services performed in this category are detailed in **Exhibit 3** attached to the
5 Hays Declaration.

6 **vii. Litigation**

7 The Firm spent 56.30 hours on Litigation, resulting in fees of \$34,736, which is 10% of the
8 total fees sought by the Application. The blended hourly rate for these services is approximately
9 \$617. Services performed in this category are detailed in **Exhibit 3** attached to the Hays
10 Declaration.

11 **viii. Plan and Disclosure Statement**

12 The Firm spent 85.60 hours on Plan and Disclosure Statement, resulting in fees of \$53,133,
13 which is less than 16% of the total fees sought by the Application. The blended hourly rate for these
14 services is approximately \$621. Services performed in this category are detailed in **Exhibit 3**
15 attached to the Hays Declaration.

16 **ix. 523/727 Litigation**

17 The Firm spent .10 hours on 523/727 Litigation, resulting in fees of \$41, which is less than
18 1% of the total fees sought by the Application. The blended hourly rate for these services is
19 approximately \$410. Services performed in this category are detailed in **Exhibit 3** attached to the
20 Hays Declaration.

21 **x. Avoidance Actions**

22 The Firm spent 61.50 hours on Avoidance Actions, resulting in fees of \$31,585, which is 9%
23 of the total fees sought by the Application. The blended hourly rate for these services is
24 approximately \$514. Services performed in this category are detailed in **Exhibit 3** attached to the
25 Hays Declaration.

26 **xi. Bill.com**

27 The Firm spent 7.50 hours on Bill.com, resulting in fees of \$4,142, which is 1% of the total
28 fees sought by the Application. The blended hourly rate for these services is approximately \$552.

Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xii. EnergyCare LLC

The Firm spent 1.50 hours on EnergyCare LLC, resulting in fees of \$854, which is less than 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$569. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xiii. Jackelyn Noe

The Firm spent .80 hours on Jackelyn Noe, resulting in fees of \$480, which is less than 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$600. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xiv. White Collar

The Firm spent .30 hours on White Collar, resulting in fees of \$180, which is less than less than 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$600. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xv. Paronich Law Firm

The Firm spent 1.30 hours on Paronich Law Firm, resulting in fees of \$822, which is less than 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$632. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xvi. Master Builders of America

The Firm spent 5.0 hours on Master Builders of America, resulting in fees of \$2,784, which is 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$557. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xvii. Kindlund Legal LLC

The Firm spent .70 hours on Kindlund Legal LLC, resulting in fees of \$348, which is less

1 than 1% of the total fees sought by the Application. The blended hourly rate for these services is
2 approximately \$497. Services performed in this category are detailed in **Exhibit 3** attached to the
3 Hays Declaration.

4 **xviii. Finlays HR**

5 The Firm spent 1.10 hours on Finlays HR, resulting in fees of \$636, which is less than 1% of
6 the total fees sought by the Application. The blended hourly rate for these services is approximately
7 \$578. Services performed in this category are detailed in **Exhibit 3** attached to the Hays
8 Declaration.

9 **xix. Derrick Landry**

10 The Firm spent .90 hours on Derrick Landry, resulting in fees of \$516, which is less than 1%
11 of the total fees sought by the Application. The blended hourly rate for these services is
12 approximately \$573. Services performed in this category are detailed in **Exhibit 3** attached to the
13 Hays Declaration.

14 **xx. Oppenheim Group**

15 The Firm spent .80 hours on Oppenheim Group, resulting in fees of \$432, which is less than
16 1% of the total fees sought by the Application. The blended hourly rate for these services is
17 approximately \$540. Services performed in this category are detailed in **Exhibit 3** attached to the
18 Hays Declaration.

19 **xxi. Administrative Claims**

20 The Firm spent 29.90 hours on Administrative Claims, resulting in fees of \$14,263, which is
21 4% of the total fees sought by the Application. The blended hourly rate for these services is
22 approximately \$477. Services performed in this category are detailed in **Exhibit 3** attached to the
23 Hays Declaration.

24 **xxii. Secured Claims**

25 The Firm spent 5.0 hours on Secured Claims, resulting in fees of \$2,059, which is 1% of the
26 total fees sought by the Application. The blended hourly rate for these services is approximately
27 \$412. Services performed in this category are detailed in **Exhibit 3** attached to the Hays
28 Declaration.

xxiii. Business Operations

The Firm spent 7.40 hours on Business Operations, resulting in fees of \$3,214, which is 1% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$434. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xxiv. Case Administration

The Firm spent 45.70 hours on Case Administration, resulting in fees of \$27,005, which is 8% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$591. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xxv. Claims Administration and Objections

The Firm spent 202.10 hours on Claims Administration and Objections, resulting in fees of \$105,140, which is less than 31% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$520. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xxvi. Fee/Employment Applications

The Firm spent 85.40 hours on Employment and Fee Applications, resulting in fees of \$38,067, which is 11% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$446. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

xxvii. Fee/Employment Objections

The Firm spent 38.60 hours on Fee/Employment Objections, resulting in fees of \$10,522, which is 3% of the total fees sought by the Application. The blended hourly rate for these services is approximately \$273. Services performed in this category are detailed in **Exhibit 3** attached to the Hays Declaration.

E. Detailed Statement of Services Performed – LBR 2016-1(a)(1)(e)

Pursuant to LBR 2016-1(a)(1)(E), “the application must contain a detailed listing of all time spent by the professional on matters for which compensation is sought” including date service was

rendered, detailed description of service, amount of time spent, and identification of person who rendered service.

Attached to the Hays Declaration as **Exhibit 3** is a copy of the Firm's computer billing printout of all of the Firm's time records for this case, as kept in the ordinary course of business during the Reporting Period. The detail set forth in **Exhibit 3** enumerates the services performed by the Firm during the period covered by this Application. Attached to the Hays Declaration as **Exhibit 4** is a summary schedule of the fees requested, as recommended in the U.S. Trustee Guidelines. The persons who rendered services in connection with the Firm's representation of the Estate are identified in the billing detail by their initials. Those persons are:

DEH	D. Edward Hays
CVH	Chad V. Haes
DAW	David A. Wood
KAT	Kristine A. Thagard
LM	Laila Masud
AEd	Aaron E. de Leest
BNB	Bradford N. Barnhardt
SRH	Sarah R. Hasselberger
ANM	Alina N. Mamlyuk
DND	Devon N. De Los Reyes
PK	Pamela Kraus
LB	Layla Buchanan
CM	Chanel Mendoza
CB	Cynthia Bastida
SP	Sandee Pineda
KF	Kathleen Frederick

There have been intra-office conferences billed by attorneys and paralegals. The Firm believes that, at times, intra-office conferencing is a necessary part of its ability to efficiently and effectively represent a bankruptcy estate by assembling a "team" of lawyers to work on the case. This team consists primarily of a supervising partner, one or more associate attorneys, and one or more paralegals. As a part of this team approach to representing Trustee, the supervising partner analyzes the needs of the client and assigns to the associates or paralegal tasks based upon the level of expertise and experience needed to complete the task.

F. Detailed Statement of Costs Incurred – LBR 2016-1(a)(1)(F)

Pursuant to LBR 2016-1(a)(1)(F), "an application that seeks reimbursement of actual and

1 necessary expenses must include a summary listing of all expenses by category (*i.e.*, long distance
2 telephone, photocopy costs, facsimile charges, travel, messenger and computer research). As to each
3 unusual or costly expense item, the application must state: (i) the date the expense was incurred; (ii) a
4 description of the expense; (iii) the amount of the expense; and (iv) an explanation of the expense.”

5 Attached to the Haes Declaration as **Exhibit 5** is a schedule of costs and expenses incurred
6 or paid by the Firm during the relevant time period but not yet reimbursed. Attached to the Hays
7 Declaration as **Exhibit 6** is a summary schedule of costs, as recommended in the U.S. Trustee
8 Guidelines. The Firm believes and represents that the costs and expenses are reasonable under the
9 circumstances of this case and the various pleadings filed by the Firm on behalf of Trustee.

10 During the Reporting Period, the Firm incurred expenses of \$X. These expenses were actual
11 expenses incurred in connection with the services rendered on behalf of the Estate. Expenses of this
12 type are billed to and paid by the Firm’s clients who pay monthly without contingency as to
13 payment.

14 **i. Document Reproduction**

15 The Firm incurred \$685.50 during the Reporting Period in document reproduction expenses,
16 *i.e.* for copying and scanning. All internal document reproductions are made after the attorney or
17 paralegal enters the case number into a computer system that tracks and calculates the number of
18 copies or scans by page. The Firm charges all clients \$0.20 per page for copies and \$0.10 per page
19 for document scanning. All outside document reproduction charges are as invoiced by the vendor.

20 **i. Telephonic Court Appearance**

21 The Firm incurred \$25.25 during the Reporting Period in costs related to Telephonic Court
22 Appearance.

23 **ii. Online Research**

24 The Firm incurred \$531.84 during the Reporting Period in costs related to online computer
25 research including Westlaw, Lexis, and PACER. With respect to PACER charges, the Firm
26 subscribes to a service which collects and aggregates free courtesy copies of filings in a cloud
27 database which can be thereafter accessed for no additional charge. However, in the course of the
28 Firm’s representation, documents are sometimes improperly indexed by the cloud service or the

courtesy copy is not correctly transmitted to the designated e-mail address, resulting in minimal PACER charges to retrieve these documents. Additionally, PACER charges are unavoidably incurred where the Firm seeks to retrieve documents for which no party has previously received a courtesy copy, such as court filings in cases outside the main bankruptcy case or adversary proceedings, or cases pre-dating the Firm's employment and filing of a request for courtesy notice.

iii. Delivery Services/Messenger

The Firm incurred \$403.15 during the Reporting Period in costs related to delivery services/messenger.

iv. Postage

The Firm incurred \$440.22 during the Reporting Period in postage charges for mailing. The Firm charges postage to clients when multiple envelopes are being mailed at a single time. The paralegal or legal assistant enters the client code and precise postage into a cost recovery system in the mail room. The Firm then records these charges on the client account.

v. Subpoena Fees

The Firm incurred \$138.06 during the Reporting Period in costs related to Subpoena Fees

G. Hourly Rates – LBR 2016-1(a)(1)(G)

Pursuant to LBR 2016-1(a)(1)(G), "unless employment has been approved on a fixed fee, percentage fee, or contingent fee basis, the application must contain a listing of the hourly rates charged by each person whose services form a basis for the fees requested in the application. The application must contain a summary indicating for each attorney by name: (i) The hourly rate and the periods each rate was in effect; (ii) The total hours in the application for which compensation is sought; and (iii) The total fee requested in the application."

<u>Timekeeper</u>	<u>Rate/Period</u>	<u>Total Hours</u>	<u>Total Fees</u>
D. Edward Hays	08/01/2024 to 09/23/2024		
	\$740	122.9	90,946.00
	NC	4.0	0.00
Chad V. Haes	08/01/2024 to 09/23/2024		
	\$600	54.0	32,400.00
	NC	0.4	0.00
David A. Wood	08/01/2024 to 09/23/2024		
	\$610	11.5	7,015.00

1		NC	3.0	0.00
2	Kristine A. Thagard	08/01/2023 to 08/31/2024		
3		\$650	0.7	455.00
4		NC	0.0	0.00
5	Laila Masud	08/01/2024 to 09/23/2024		
6		\$540	46.6	25,164.00
7		NC	32.7	0.00
8	Aaron E. de Leest	08/01/2024 to 09/23/2024		
9		\$610	166.9	101,809.00
10		NC	1.5	0.00
11	Bradford N. Barnhardt	08/01/2024 to 09/23/2024		
12		\$410	75.0	30,750.00
13		NC	1.3	0.00
14	Sarah R. Hasselberger	08/01/2024 to 08/31/2024		
15		\$390	0.0	0.00
16		NC	0.1	0.00
17	Alina N. Mamlyuk	08/01/2024 to 09/23/2024		
18		\$500	43.5	21,750.00
19		NC	2.4	0.00
20	Devan N. De Los Reyes	08/01/2024 to 09/23/2024		
21		\$360	28.6	10,296.00
22		NC	2.8	0.00
23	Pamela Kraus	09/01/2024 to 09/23/2024		
24		\$340	2.7	918.00
25		NC	0.0	0.00
26	Chanel Mendoza	08/01/2024 to 08/31/2024		
27		\$340	2.9	986.00
28		NC	0.0	0.00
29	Layla Buchanan	09/01/2024 to 09/23/2024		
30		\$340	32.2	10,948.00
31		NC	0.2	0.00
32	Cynthia Bastida	09/01/2024 to 09/23/2024		
33		\$340	2.0	680.00
34		NC	0.0	0.00
35	Sandee Pineda	09/01/2024 to 09/23/2024		
36		\$340	15.2	5,168.00
37		NC	0.0	0.00
38	Kathleen Frederick	08/01/2024 to 08/31/2024		
39		\$290	3.9	1,131.00
40		NC	0.0	0.00
41	Totals:		657.0	340,416.00

H. Professional Education and Experience – LBR 2016-1(a)(1)(H)

Pursuant to LBR 2016-1(a)(1)(H), the Application must include “a description of the professional education and experience of each of the individuals rendering services, including identification of the professional school attended, year of graduation, year admitted to practice, publications or other achievements, and explanation of any specialized background or expertise in bankruptcy-related matters.”

A brief biographical description of the professionals who rendered services for which compensation is sought by this Application is attached to the Hays Declaration as **Exhibit 7**. The Firm believes and represents that the services rendered during the Reporting Period have been beneficial to the estate and that this request for allowance of compensation is fair and reasonable.

I. Change in Professional Rates – LBR 2016-1(a)(1)(I)

Pursuant to LBR 2016-1(a)(1)(I), “if the hourly rate has changed during the period covered by the application, the application must specify the rate that applies to the particular hours for which compensation is sought.” The hourly rates of the Firm’s professionals did change during the Reporting Period, and the rates that apply to the particular hours for which compensation is sought are set forth both in the chart above at Section G. No compensation is sought for the preparation of the notice of changed hourly rates.

J. Client Declaration – LBR 2016-1(a)(1)(J)

Pursuant to LBR 2016-1(a)(1)(J), the Application must include “a separately filed declaration from the client indicating that the client has reviewed the fee application and has no objection to it.”

The executed Declaration of Trustee indicating his review and position on the Application will be separately submitted in advance of the hearing on this fee application.

4. Legal Argument

Generally, “any professional person employed under [S]ection 327 or 1103 of this title may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered before the date of such an application or reimbursement for expenses incurred before such date as is provided under

1 section 330 of this title. After notice and a hearing, the court may allow and disburse to such
2 applicant such compensation or reimbursement.” *See* 11 U.S.C. § 331.

3 No fee applications have been filed in this case. As such, no fee applications have been filed
4 within 120 days of this Application. Further, this Application shall be properly noticed and set for
5 hearing within the parameters of Section 331.

6 **A. The Firm’s fees are reasonable and should be approved on a final**
7 **basis.**

8 The Bankruptcy Code provides that the Court can authorize payment of reasonable and
9 necessary compensation and reimbursement of expenses.

10 (a) (1) After notice to the parties in interest and the United States
11 Trustee and a hearing, and subject to sections 326, 328, and 329, the
12 court may award to a trustee, an examiner, a professional person
13 employed under section 327 or 1103- (A) reasonable compensation for
14 actual, necessary services rendered by the trustee, examiner,
15 professional person, or attorney and by any paraprofessional person
16 employed by any such person; and

17 (B) reimbursement for actual, necessary expenses.

18 11 U.S.C. §330.

19 In the Ninth Circuit, the test for calculating a reasonable attorney’s fee under 11 U.S.C. § 330
20 is the lodestar method. “The primary method used to determine a reasonable attorney fee in a
21 bankruptcy case is to multiply the number of hours expended by an hourly rate.” *Id.* at 1471. *In re*
22 *Yermakov*, 718 F.2d 1465, 1471 (9th Cir. 1983). This lodestar or basic fee, if warranted, can then be
23 adjusted upward or downward. *In re Powerine Oil Co.*, 71 B.R. 767 (9th Cir. BAP 1986).

24 Services which were not “reasonably likely to benefit the estate” or were not “necessary to
25 the administration of the case” are not compensable. 11 U.S.C. § 330(a)(4). In considering a fee
26 award, the court must consider “whether the services were necessary to the administration of, or
27 beneficial at the time at which the service was rendered toward the completion of, a case.” 11 U.S.C.
28 § 330 (a)(3)(C) (emphasis added); *Roberts, Sheridan & Kotel, P.C. v. Bergen Brunswick Drug Co. (In*

1 *re Mednet*), 251 B.R. 103, 108 (9th Cir. BAP 2000) (“...the applicant must demonstrate only that the
2 services were ‘reasonably likely’ to benefit the estate at the time the services were rendered.”); *see*,
3 *e.g.*, *Mohsen v. Wu (In re Mohsen)*, 506 B.R. 96, 106-10 (N.D. Cal. 2013).

4 Based upon the foregoing points and authorities and the declarations and the attached
5 exhibits, the Firm believes that the fees and costs requested are reasonable given the benefit
6 conferred on the Estate’s creditors.

7 **5. Conclusion**

8 The Firm requests that this Court approve this Application and enter its Order as follows:

- 9 1. Approving and allowing on a ***final basis*** the amount of \$1,332,352 in fees previously
10 awarded on an interim basis via the First Application Order;
- 11 2. Approving and on a ***final*** basis the amount of \$46,897.69 in costs previously awarded
12 on an interim basis via the First Application Order;
- 13 3. Approving the Firm’s fees as requested in this application in the amount of \$340,416
14 on a final basis;
- 15 4. Approving the Firm’s costs in this application in the amount of \$2,224.32 on a final
16 basis;
- 17 5. Authorizing the Trustee to pay all of the Firm’s allowed fees and reimbursement of
18 costs as administrative expenses, to the extent that funds are available; and
- 19 6. For any other and further relief that the Court deems proper.

20
21 DATED: November 8, 2024

MARSHACK HAYS WOOD LLP

22
23 By: /s/ D. Edward Hays
24 D. EDWARD HAYS
25 LAILA RAIS *fka* MASUD
General Counsel for Chapter 11 Trustee,
26 RICHARD A. MARSHACK
27
28

Declaration Of D. Edward Hays

I, D. EDWARD HAYS, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.

2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration. The facts set forth below are true of my personal knowledge.

3. I am an attorney at law duly admitted to practice before this Court and all courts of the State of California.

4. I am a partner of the law firm of Marshack Hays Wood LLP, attorneys for Richard A. Marshack, the Chapter 7 Trustee ("Trustee") for the Bankruptcy Estate ("Estate") of The Litigation Practice Group, P.C. ("Debtor") and maintain offices at 870 Roosevelt, Irvine, California, 92620.

5. I make this declaration in support of the Firm's Second and Final Interim Application for Allowance of Fees and Costs ("Application"). All terms not otherwise defined herein are used as they are defined in the Application.

6. This Application encompasses services rendered and expenses paid or incurred during the two month period from August 1, 2024, through and including September 23, 2024 ("Reporting Period").

7. The Firm's first interim Application which covered the period of April 20, 2023, through and including July 31, 2024, was filed on September 3, 2024, as Dk. No. 1617 ("First Application").

8. I am the designated professional responsible for overseeing the billing in this matter and for assuring compliance with the Guidelines for the United States Trustee related to billing.

9. I have reviewed the Court's PACER docket and electronic case files for this case to refresh my memory as to the specific filing and entry dates of the documents referenced in this Application. The information referenced in this Application from the pleadings filed in this case is true and accurate.

1 10. With the exception of the general sharing of compensation between members and
2 employees of the Firm, no agreement or understanding exists between the Firm and any other
3 individual or entity for the sharing of compensation to be received for services rendered or the
4 reimbursement of costs incurred in or in connection with this case.

5 11. On March 20, 2023, The Litigation Practice Group P.C. (“Debtor”) filed a voluntary
6 petition under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*
7 (“Bankruptcy Code”), which commenced the above-referenced bankruptcy case (“Bankruptcy
8 Case”).

9 12. On May 8, 2023, the Office of the United States Trustee (“U.S. Trustee”) appointed
10 Richard A. Marshack (“Trustee”) to serve in a fiduciary capacity as the chapter 11 trustee of the
11 Debtor’s Estate.

12 13. On May 19, 2023, as Dk. No. 75, Trustee filed an application to employ the Firm as
13 general counsel (“Employment Application”).

14 14. On June 22, 2023, as Dk. No. 129, the Court entered the Employment Order
15 (“Employment Order”). A true and correct copy of the Employment Order is attached as **Exhibit 1**.

16 15. A true and correct copy of the Fee App Order is attached as **Exhibit 2**.

17 16. A true and correct copy of the schedule of requested by the Firm during the relevant
18 time period is attached to this declaration as **Exhibit 3**.

19 17. A true and correct copy of the summary schedule of fees as recommended by the U.S.
20 Trustee Guidelines is attached to this declaration as **Exhibit 4**.

21 18. A true and correct copy of the schedule of costs and expenses incurred or paid by the
22 Firm during the relevant time period is attached to this declaration as **Exhibit 5**.

23 19. A true and correct copy of the summary schedule of costs as recommended by the
24 U.S. Trustee Guidelines is attached to this declaration as **Exhibit 6**.

25 20. A true and correct copy of the Firm’s resume, containing a brief biographical
26 description of the attorneys who rendered services for which compensation is sought by this
27 Application, is attached to this declaration as **Exhibit 7**.

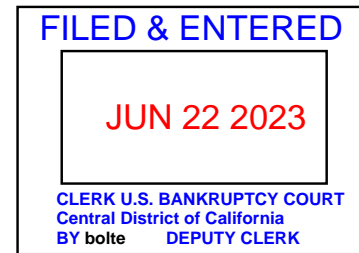
28

/s/ D. Edward Hays
D. EDWARD HAYS

EXHIBIT 1

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 LAILA MASUD, #311731
lmasud@marshackhays.com
3 MARSHACK HAYS LLP
870 Roosevelt
4 Irvine, California 92620
Telephone: (949) 333-7777
5 Facsimile: (949) 333-7778

6 Attorneys for Chapter 11 Trustee,
RICHARD A. MARSHACK



7 UNITED STATES BANKRUPTCY COURT

8 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION
9

10 In re
11 THE LITIGATION PRACTICE GROUP,
12
13 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

ORDER GRANTING APPLICATION BY
CHAPTER 11 TRUSTEE TO EMPLOY
MARSHACK HAYS LLP AS GENERAL
COUNSEL

[NO HEARING REQUIRED]

16
17 The Court has read and considered the Application to Employ Marshack Hays LLP as
18 General Counsel (“Application”), filed by Trustee, on May 19, 2023, as Dk. No. 75. The Court finds,
19 based upon the proof of service of the notice of Application filed on May 19, 2023, as Dk. No. 76,
20 and the Declaration that no Party Requested a Hearing on Application filed on June 21, 2023, as
21 Docket No. 126, that proper notice of the Application has been given and no opposition or request
22 for hearing has been received. Accordingly, the court finds good cause to grant the Application, and
23 the court enters its order as follows:

24 IT IS ORDERED:

- 25 1. The Application is approved;
26 2. Trustee is authorized to employ the Firm as his general counsel pursuant to 11 U.S.C.
27 § 327 at the Firm’s hourly rates with any compensation and reimbursement of costs to be paid by the
28 Estate only upon application to and approval by the Court pursuant to 11 U.S.C. §§ 330 and 331; and


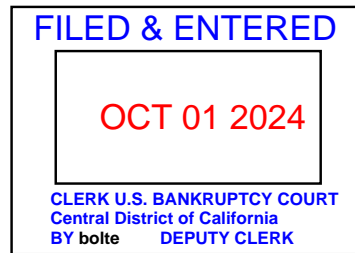

Scott C. Clarkson
United States Bankruptcy Judge

EXHIBIT 2

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 LAILA RAIS fka MASUD, #311731
lmasud@marshackhays.com
3 MARSHACK HAYS LLP
870 Roosevelt
4 Irvine, California 92620
Telephone: (949) 333-7777
5 Facsimile: (949) 333-7778
6 Attorneys for Chapter 11 Trustee
RICHARD A. MARSHACK
7



8 UNITED STATES BANKRUPTCY COURT

9 CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

10 In re
11 THE LITIGATION PRACTICE GROUP P.C.,
12
13
14 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

OMNIBUS ORDER GRANTING
APPLICATIONS FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES

Hearing:

Date: September 24, 2024

Time: 10:00 a.m.

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C

411 W. Fourth Street
Santa Ana, CA 92701

20 On September 24, 2024, hearings were held before the Honorable Scott C. Clarkson, United
21 States Bankruptcy Judge, in the above-referenced bankruptcy case, on the following Applications for
22 Allowance of Fees and Costs ("Fee Applications") filed by the professionals as detailed below
23 (collectively, "Professionals"), seeking compensation and reimbursement of expenses:

24 A. Dk No. 1576, filed on August 29, 2024, Application for Payment of Interim Fees
25 and/or Expenses for Robert F. Bicher & Associates, Field Agent and Forensic Analyst for Chapter
26 11 Trustee, Richard A. Marshack ("Trustee");
27
28

1 B. Dk No. 1577, filed on August 29, 2024, Application for Payment of Interim Fees
2 and/or Expenses for Omni Agent Solutions, Inc., Claims and Noticing Agent for Estate;

3 C. Dk No. 1608, filed on September 3, 2024, First Interim Application for Compensation
4 and Reimbursement of Expenses for Grobstein Teeple, LLP, Accountants for the Trustee;

5 D. Dk No. 1613, filed on September 3, 2024, First Interim Application for Compensation
6 and Reimbursement of Expenses for Nancy Rapoport, Court Appointed Ethics Compliance Monitor.

7 E. Dk No. 1616, filed on September 3, 2024, Chapter 11 Trustee's First Interim Report
8 and Application for Allowance of Fees and Costs;

9 F. Dk No. 1617, filed on September 3, 2024, First Interim Application for Allowance of
10 Fees and Costs for Marshack Hays Wood, LLP, General Counsel for Trustee;

11 G. Dk No. 1619, filed on September 3, 2024, First Interim Application for Compensation
12 and Reimbursement of Expenses for Fox Rothschild LLP, Counsel for the Official Committee of
13 Unsecured Creditors;

14 H. Dk No. 1620, filed on September 3, 2024, First Interim Application for Compensation
15 and Reimbursement of Expenses for Force Ten Partners, LLC, Financial Advisor to the Official
16 Committee of Unsecured Creditors; and

17 I. Dk No. 1621, filed on September 3, 2024, First Chapter 11 Application for
18 Compensation and Reimbursement of Expenses for Dinsmore & Shohl LLP, Special Counsel to
19 Trustee.

20 For the reasons set forth in the Fee Applications, the Reports of Fee Examiner Nancy B.
21 Rapoport [Dks. 1673, 1697], the Trustee's Declaration [Dk. No. 1705], as posted in its Tentative
22 Ruling¹ in advance of the hearing which is expressly adopted but modified as detailed below, and for
23 any reasons stated on the record, the Court has found good cause to grant the Fee Applications:

24 IT IS ORDERED that:

25 1. The Fee Applications are granted as follows:
26
27

28 ¹ A copy of the Tentative was filed as Dk. No. 1748.

<u>Dk.</u>	<u>Robert F. Bicher & Associates Field Agent and Forensic Analyst</u>	<u>Fees/Expenses Requested</u>	<u>Allowed Fees/Expenses after \$298 Reduction Requested by Examiner</u>	<u>Interim Payments made to date</u>	<u>Allowed Amount Trustee is authorized to pay</u>
1576		\$70,478.00 \$1,259.27	\$70,180.00 \$1,259.27	\$35,666.40 \$1,259.27	\$34,513.60 \$ 0.00 ----- \$34,513.60

<u>1577</u>	<u>Omni Agent Solutions, Inc. Claims and Noticing Agent for Estate</u>	<u>Fees/Expenses Requested</u>	<u>Allowed Amount of Fees/Expenses</u>	<u>Allowed Amount Trustee is authorized to pay after 10% holdback</u>
		\$826,644.60 \$72,399.12	\$826,644.60 \$72,399.12	\$743,980.14 \$ 72,399.12 ----- \$816,379.26

<u>1608</u>	<u>Grobstein Teeple, LLP ("GT"), Accountants for Trustee</u>	<u>Fees/Expenses Requested</u>	<u>Allowed Fees/Expenses after reduction provided for in employment application (with 15% reduction as discussed below)</u>	<u>Allowed Amount Trustee is authorized to pay after 10% holdback</u>
		\$307,466.50 \$51.03	\$261,346.52 \$51.03	\$235,211.87 \$ 51.03 ----- \$235,262.90

2. As provided in GT's employment application [Dk. No. 95], GT agreed that if general unsecured creditors do not receive at least a 25% distribution on allowed claims, GT would take a voluntary 15% reduction on its standard hourly rates to the extent GT's fees were approved by the Court. This 15% reduction is without prejudice to GT later seeking payment should general unsecured creditors receive distributions of more than 25%.

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Dk. 1613	Nancy Rapoport, Court Appointed Ethics Compliance Monitor	<u>Fees/Expenses Requested</u>	<u>Allowed Fees/Expenses (No Reduction)</u>	<u>Interim Payments made to date</u>	<u>Allowed Amount Trustee is authorized to pay</u>
		\$71,958.75	\$71,958.75	\$33,992.32	\$37,966.43
		\$2,276.19	\$2,276.19	\$2,026.19	\$ 250.00

					\$38,216.43

Dk. 1616	Richard A. Marshack, Chapter 11 Trustee	<u>Fees/Expenses Requested</u>	<u>Allowed Fees/Expenses as Clarified in Dk No. 1705</u>	<u>Allowed Amount Trustee is authorized to pay</u>
		\$500,547.33	\$452,700.34	\$452,700.34
		\$1,458.15	\$1,458.15	\$ 1,458.15

				\$454,158.49

Dk. 1617	Marshack Hays Wood LLP ("MHW") General Counsel for Trustee	<u>Fees/Expenses Requested</u>	<u>Allowed Fees/Expenses after Examiner reduction of \$499</u>	<u>Allowed Amount after 5% deferral based on MHW's voluntary agreement</u>
		\$1,332,851.00	\$1,332,352.00	\$1,265,734.40
		\$46,897.69	\$46,897.69	
				<u>Allowed Amount of Fees/Expenses Trustee is authorized to pay after 5% deferral and a further 10% holdback</u>
				\$1,139,160.96
				\$ 46,897.69

				\$1,186,058.65
				Trustee is authorized to immediately pay the \$66,617.60 in approved but deferred fees if and when the condition set forth in ¶ 3 is met.

3. The Trustee and Liquidating Trustee is authorized to pay MHW its 5% deferred fees of \$66,617.60 without further order if and when the Estate and the Liquidation Trust collectively receive an additional \$6 million after the Effective Date² (“MHW Conditional Deferred Payment”).

<u>Dk.</u>		<u>Fees/Expenses Requested</u>	<u>Allowed Fees/Expenses after reductions requested by Examiner of \$3,073.50 and \$2,402.05 and the OUST³ in the amount of \$3,647</u>	<u>Allowed Amount Trustee is authorized to pay after 10% holdback</u>
1619	Fox Rothschild LLP Counsel to the Committee of Unsecured Creditors	\$1,050,894.00 \$19,823.67	\$1,044,173.50 \$17,421.62	\$939,756.15 \$ 17,421.62 ----- \$957,177.77

<u>Dk.</u>		<u>Fees/Expenses Requested</u>	<u>Allowed Fees/Expenses (no further reductions)</u>	<u>Allowed Amount Trustee is authorized to pay after 10% holdback</u>
1620	Force Ten Partners Financial Advisor to the Official Committee of Unsecured Creditors	\$187,620.00 \$0.00	\$187,620.00 \$0.00	\$168,858.00 \$ 0.00 ----- \$168,858.00

<u>Dk.</u>		<u>Fees/Expenses Requested after reductions as requested by Examiner of</u>	<u>Allowed Fees/Expenses (no further reductions)</u>	<u>Allowed Amount after \$650,000 voluntary deferral (described in ¶ 4)</u>
1621	Dinsmore & Shohl LLP (“DS”) Special Counsel for Trustee	\$169,460.75 \$4,745,825.25 \$57,379.11	\$4,745,825.25 \$57,379.11	\$4,095,825.25 \$ 57,379.11 ----- \$4,153,204.36 Trustee is authorized to immediately pay the \$650,000 in approved but deferred fees if and when the condition set forth in ¶ 4 is met.

² See, Dk. Nos. 1344, 1345, 1646.
³ Office of the United States Trustee.

1 4. On September 17, 2024, DS, the Official Committee of Unsecured Creditors, and the
2 Trustee reached an agreement concerning DS's Application. *See*, Dk No. 1698, *Stipulation by*
3 *Committee of Unsecured Creditors, Chapter 11 Trustee, and Dinsmore & Shohl LLP Regarding the*
4 *First Chapter 11 Application of Dinsmore & Shohl LLP for Compensation and Reimbursement of*
5 *Expenses for the Period May 8, 2023 Through June 30, 2024* ("Stipulation").⁴ The Stipulation sets
6 forth an agreement reached between the parties for a conditional deferred payment in the amount of
7 \$650,000 ("DS Conditional Deferred Payment"). The Trustee and Liquidating Trustee is authorized
8 to pay DS the DS Conditional Deferred Payment without further order if and when the conditions set
9 forth in the Stipulation and order approving the Stipulation are satisfied.⁵

10 5. The Trustee is authorized to pay the allowed amounts as set forth in this Order if and
11 when he determines there are sufficient funds to make such payments. If only a portion of the
12 amounts allowed by this order are paid, all professionals shall receive pro rata distributions unless
13 they otherwise agree in writing.

14 6. Professionals may seek payment of the holdbacks set forth above in their final fee
15 applications.

16 7. The Trustee is authorized to execute any other documents which may be necessary to
17 issue payments as approved and authorized by this Order.

18 8. This Court retains jurisdiction on all matters determined in this Order and to resolve
19 any disputes arising under or related to this Order.

20 # # #

21
22
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24 Date: October 1, 2024


Scott C. Clarkson
United States Bankruptcy Judge

25
26
27
28 ⁴ The Stipulation was approved by separate Court order. *See* Dk. No. 1714.

⁵ *Supra* Footnote 1.

EXHIBIT 3

MARSHACK HAYS WOOD LLP

870 Roosevelt | Irvine, CA 92620 | 949.333.7777

November 8, 2024

Richard Marshack, Trustee
870 Roosevelt Avenue
Irvine, CA 92620

Invoice # 17165
Client # 1015
Matter # 157

INVOICE SUMMARY

For Professional Services Rendered for the period ending: September 23, 2024

Re: Richard A. Marshack, Trustee, Litigation Practice Group (8:23-bk-10571-SC)

Current Fees	\$ 340,416.00
Current Disbursements	<u>\$ 2,224.32</u>
TOTAL CURRENT CHARGES	\$ 342,640.32
Previous Balance	<u>\$ 193,690.04</u>
TOTAL BALANCE DUE	<u>\$ 536,330.36</u>

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

FEES

.2 OHP Adversary Action (23-01098)

Date	Atty	Description	Hours	Rate	Amount
8/01/24	DEH	Telephone conference with Christopher Celentino re: negotiations and resolution of disputed terms for stipulation with Azzure and Committee;	.20	740.00	148.00
8/01/24	DEH	Review and revise stipulation with Azzure, Committee, and Trustee for use of cash collateral and replacement lien (.20); Written correspondence with Christopher Celentino re: same (.10);	.30	740.00	222.00
8/19/24	DEH	Review and analyze court's ruling granting summary adjudication that PECC's UCC-1 was preferential;	.30	740.00	222.00
Sub-Total Fees:			.80		\$ 592.00

.3 Marshack v. Diab (23-01046)

Date	Atty	Description	Hours	Rate	Amount
8/02/24	BNB	Telephone conference with Marshack Hays Wood Operator re: saving subpoena response production received from Bank of America (No Charge);	.10	410.00	N/C
8/15/24	DEH	Court appearance re: Trustee's emergency motion for right to attach order (1.80); Telephone conferences with Christopher Ghio during breaks re: settlement negotiations (.30); Telephone conference with Richard A. Marshack re: hearing results (.20);	2.30	740.00	1,702.00
8/26/24	LB	Conference with Bradford N. Barnhardt re: Bank of America subpoenaed documents (.10); Review documents provided by Bank of America re: same (.50);	.60	340.00	204.00
8/30/24	DEH	Research re: California authority interpreting good faith defense for transferees of actual fraudulent transfers and extent of transferee's knowledge re: fraud (.20); Written correspondence with Christopher Ghio, Yosina Lissebeck, Nick Koffroth, and Keith Owens re: same (.10);	.30	740.00	222.00
9/11/24	DEH	Written correspondence with Christopher Celentino and Tyler Powell re: Bridge appeal being interlocutory and subject to dismissal;	.20	740.00	148.00
9/20/24	BNB	Written correspondence with Jeremy Freedman re: revisions to updated American Express subpoena to limit document request;	.10	410.00	41.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
Sub-Total Fees:			3.60		\$ 2,317.00

.4 Han Trinh (24-02077)

Date	Atty	Description	Hours	Rate	Amount
9/12/24	LB	Draft notice of appellees Statement of Election to Proceed in District Court;	.20	340.00	68.00
9/13/24	AEd	Review and analyze Notices of appeals for Greyson Law, Phuong Jayde Trinh, and Han Trinh;	.20	610.00	122.00
9/13/24	AEd	Draft written correspondence to Alina N. Mamlyuk re: elections to district court;	.10	610.00	61.00
9/17/24	LB	Review and finalize Statement of Election to Proceed in District Court re: Appeal;	.20	340.00	68.00
9/23/24	LM	Telephone conference with Alina N. Mamlyuk re: billing re: appellate briefing and possible consolidation of appeals for efficient administration and samples;	.30	540.00	162.00
9/23/24	ANM	Analyze the statement of issues filed in Han Trinh's appeal of order denying her motion of administrative expense;	.10	500.00	50.00
9/23/24	ANM	Telephone conference with Laila Masud re: billing re: appellate briefing and possible consolidation of appeals for efficient administration and samples;	.30	500.00	150.00
Sub-Total Fees:			1.40		\$ 681.00

.5 Jayde Trinh (24-02243)

Date	Atty	Description	Hours	Rate	Amount
9/12/24	LB	Draft notice of appellees Statement of Election to Proceed in District Court;	.20	340.00	68.00
9/17/24	LB	Review and finalize Statement of Election to Proceed in District Court re: Appeal;	.20	340.00	68.00
9/23/24	ANM	Analyze the statement of issues filed in Jayde Trinh's appeal of order denying her motion for administrative expense;	.10	500.00	50.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
		Sub-Total Fees:	.50		\$ 186.00

.6 Greyson (24-02074)

Date	Atty	Description	Hours	Rate	Amount
8/27/24	DAW	Review and analyze 60 page memorandum of decision denying the administrative law claim of Greyson Law Center (No Charge);	1.50	610.00	N/C
9/12/24	LB	Draft notice of appellees Statement of Election to Proceed in District Court;	.30	340.00	102.00
9/13/24	ANM	Reviewed notices of election for appeal; drafted and sent e-mail correspondence to Layla Buchanan re: changing caption;	.10	500.00	50.00
9/17/24	LB	Review and finalize Statement of Election to Proceed in District Court re: Appeal;	.20	340.00	68.00
9/17/24	DND	Review notice of appeal, election to proceed in District Court, transcript order form re: appeals of orders denying administrative claims of Greyson, Han Trinh, Jayde Trinh;	.10	360.00	36.00
9/23/24	ANM	Analyze the statement of issues filed in Greyson's appeal of denial of its administrative expense motion;	.20	500.00	100.00
9/23/24	ANM	Telephone conference with Layla Buchanan re: capacity to research invoices Greyson attached to its motion for admin claim to see how much work was done on 2500 "client files" as asserted by Greyson;	.10	500.00	50.00
		Sub-Total Fees:	2.50		\$ 406.00

1 Asset Analysis and Recovery

Date	Atty	Description	Hours	Rate	Amount
8/06/24	DND	Review e-mail correspondence between Alina N. Mamlyuk and Andrew Still re: transfers to Alteryx;	.20	360.00	72.00
8/07/24	DND	Review e-mail correspondence from D. Edward Hays to Andrew Still re: basis of Alteryx complaint;	.10	360.00	36.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
8/08/24	DND	Review e-mail correspondence from D. Edward Hays re: 3rd circuit Galaxy decision, relevance to Alteryx complaint (.10); Review of decision (.20);	.30	360.00	108.00
8/13/24	AEd	Review written correspondence from Richard A. Marshack and D. Edward Hays re: American Express claw back issues;	.10	610.00	61.00
8/14/24	BNB	Conference with Operator re: thumbdrive from Bank of America and saving document production (No Charge);	.10	410.00	N/C
8/14/24	BNB	Written correspondence with Yosina Lissebeck re: discovery index (No Charge);	.10	410.00	N/C
8/14/24	AEd	Review written correspondence from Yosina Lissebeck re: American Express claims and review transfer analysis from accountants and draft written responses to Yosina Lissebeck;	.80	610.00	488.00
8/14/24	AEd	Review written correspondence from Bradford N. Barnhardt re: bank subpoenas and briefly review summary of same;	.20	610.00	122.00
8/15/24	BNB	Written correspondence with Kevin Mruk, D. Edward Hays, and Laila Masud re: JPMorgan Chase accounts and Know Your Customer requirements;	.10	410.00	41.00
8/16/24	BNB	Telephone conference with Marshack Hays Wood Operator re: accessing Bank of America production;	.10	410.00	41.00
8/19/24	BNB	Telephone conference with Marshack Hays Wood Operator re: Bank of America production (.10); Written correspondence with Bank of America re: need for passcode (.10);	.20	410.00	82.00
8/19/24	BNB	Written correspondence with Jeremy Freedman re: Bank of America production;	.10	410.00	41.00
8/20/24	BNB	Written correspondence with Marshack Hays Wood operator and Bank of America re: accessing Bank of America production;	.20	410.00	82.00
8/20/24	AEd	Review pre-petition and post-petition transfer analysis from Trustee's accountants;	.90	610.00	549.00
8/21/24	BNB	Written correspondence with Layla Buchanan re: uploading Bank of America production to sharefolder;	.10	410.00	41.00
8/22/24	AEd	Review summary of bank subpoena production;	.40	610.00	244.00
8/23/24	BNB	Written correspondence with Layla Buchanan re: uploading Bank of America production to sharefolder;	.10	410.00	41.00
8/23/24	AEd	Review avoidance power analysis and status report and prepare punch list for bringing avoiding power claims;	1.40	610.00	854.00
8/26/24	BNB	Telephone conference with and written correspondence with Layla Buchanan re: link to Dinsmore sharefile;	.10	410.00	41.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
8/27/24	AEd	Review written correspondence from Nick Cooper re: document requests for bank accounts and review attached chart;	.20	610.00	122.00
9/04/24	AEd	Review written correspondence from Nick Cooper and updated bank account tracking chart;	.10	610.00	61.00
9/04/24	AEd	Review written correspondence from Yosina Lissebeck and Eric Lee re: 241 and Spoton;	.20	610.00	122.00
9/11/24	AEd	Draft written correspondence to Chad V. Haes and Richard A. Marshack re: avoidance power claims and review response from Chad V. Haes;	.20	610.00	122.00
9/13/24	BNB	Written correspondence with Tyler Powell re: Rule 2004 application to Bank of America for additional accounts found by accountants;	.10	410.00	41.00
9/17/24	AEd	Telephone conference with Bill Mitchell re: Matt Anderson (.20); Draft written correspondence to Yosina Lissebeck and Richard A. Marshack re: same (.10);	.30	610.00	183.00
9/18/24	BNB	Telephone conference with Layla Buchanan re: exclusion of Unified Global from omnibus claim objections;	.10	410.00	41.00
9/18/24	BNB	Written correspondence with Dinsmore team re: drafting subpoena for bank records in Beyrooti adversary proceeding;	.10	410.00	41.00
9/18/24	AEd	Review written correspondence from Christopher Celentino re: Matt Anderson;	.10	610.00	61.00
9/19/24	BNB	Review and revise subpoena to American Express in Diab adversary proceeding, including review of past stipulation with Han Trinh to limit subpoena production;	.80	410.00	328.00
9/20/24	BNB	Written correspondence with accounting re: payment of Bank of America subpoena invoice;	.10	410.00	41.00
9/23/24	BNB	Review and revise subpoena to U.S. Bank in Bayrooti adversary proceeding;	.10	410.00	41.00
9/23/24	BNB	Telephone conference with Layla Buchanan re: addresses for service of Bayrooti subpoenas;	.10	410.00	41.00
9/23/24	BNB	Review and revise subpoena to Bank of America in Leucadia adversary proceeding;	.60	410.00	246.00
9/23/24	BNB	Review and revise U.S. Bancorp subpoena in Leucadia adversary proceeding;	.20	410.00	82.00
9/23/24	BNB	Written correspondence with Layla Buchanan re: service of Leucadia subpoenas (.10); Written correspondence with Yosina Lissebeck re: same (.10);	.20	410.00	82.00
9/23/24	BNB	Telephone conference with and written correspondence with Kathleen Frederick re: signing into Dinsmore sharefile;	.10	410.00	41.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
9/23/24	BNB	Review and revise subpoena to U.S. Bancorp Advisors in Bayrooti adversary proceeding;	.20	410.00	82.00
9/23/24	BNB	Written correspondence with Layla Buchanan re: service of Marshack v. Bayrooti subpoenas;	.10	410.00	41.00
9/23/24	BNB	Review and revise subpoena to Charles Schwab in Bayrooti adversary proceeding;	.30	410.00	123.00
9/23/24	BNB	Review and revise subpoena to JPMorgan Chase in Leucadia adversary proceeding;	.20	410.00	82.00
9/23/24	BNB	Review and revise subpoena to Optimum in Leucadia adversary proceeding;	.30	410.00	123.00
9/23/24	BNB	Review and revise subpoena to Wells Fargo in Leucadia adversary proceeding;	.20	410.00	82.00
9/23/24	BNB	Written correspondence with Aaron E. de Leest re: service of several subpoenas in Leucadia adversary proceeding;	.10	410.00	41.00
9/23/24	AEd	Review written correspondence from Yosina Lissebeck re: bank subpoenas and draft written response to Bradford N. Barnhardt;	.10	610.00	61.00
Sub-Total Fees:			10.70		\$ 5,275.00

10 Litigation

Date	Atty	Description	Hours	Rate	Amount
8/02/24	DEH	Review and analyze lengthy memorandum prepared by Dinsmore re: whether Section 522 extinguishes Azzure's lien on revenues received and earned post-petition (.40); Written correspondence with Yosina Lissebeck re: same (.10);	.50	740.00	370.00
8/02/24	DEH	Revise and supplement complaint against Alteryx;	2.80	740.00	2,072.00
8/02/24	DEH	Telephone conference with Yosina Lissebeck re: meeting with committee counsel and objections to priority and other claims;	.20	740.00	148.00
8/02/24	BNB	Written correspondence with D. Edward Hays and Keith Owens Eubanks re: Monterey County prosecutor investigation and setting up call;	.10	410.00	41.00
8/03/24	DEH	Revise and supplement Alteryx complaint;	1.60	740.00	1,184.00
8/03/24	DEH	Written correspondence with Christopher Celentino and Yosina Lissebeck re: 552 terminating potential liens on recovered assets;	.30	740.00	222.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
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Date	Atty	Description	Hours	Rate	Amount
8/05/24	DEH	Telephone conference with Bradford N. Barnhardt re: order granting motion to value secured claims at zero (.10); Written correspondence with Yosina Lissebeck re: same (.10);	.20	740.00	148.00
8/05/24	DEH	Written correspondence with Sharon Weiss re: execution of stipulation re: use of cash collateral (.10); Written correspondence with Nick Koffroth re: same (.10);	.20	740.00	148.00
8/05/24	DEH	Revise and supplement Alteryx complaint;	.30	740.00	222.00
8/06/24	DEH	Conference call with Richard A. Marshack and Yosina Lissebeck re: master list of case issues and tasks;	1.30	740.00	962.00
8/06/24	DEH	Conference calls with Richard A. Marshack and Yosina Lissebeck re: master list of pending and anticipated adversary proceedings and contested matters, status, and litigation decisions;	2.00	740.00	1,480.00
8/06/24	DEH	Written correspondence with Andrew Still re: complaint against Alteryx and claims for relief;	.20	740.00	148.00
8/06/24	DEH	Revise and finalize stipulation with Azzure for use of cash collateral and replacement lien (.10); Written correspondence with Sharon Weiss and Nick Koffroth re: same (.20);	.30	740.00	222.00
8/07/24	DAW	Review and analyze multiple lengthy e-mail correspondence from Chris Cellini, Trustee, and D. Edward Hays re: fee examiner and inquiries by Law 360;	.30	610.00	183.00
8/08/24	DEH	Review and analyze new 3rd Circuit case canceling obligation as fraudulent in order to recovery payments on account of such obligation as being for less than reasonably equivalent value;	.40	740.00	296.00
8/08/24	DEH	Revise and supplement chart of initial and remaining secured claims;	.40	740.00	296.00
8/08/24	DEH	Revise and supplement complaint against Alteryx (1.20); Written correspondence with Alina N. Mamlyuk re: same (.20);	1.40	740.00	1,036.00
8/08/24	DEH	Telephone conference with Alina N. Mamlyuk re: facts supporting claims against Alteryx;	.60	740.00	444.00
8/08/24	BNB	Written correspondence with D. Edward Hays re: preparing order to approve Azzure stipulation;	.10	410.00	41.00
8/09/24	DEH	Standing conference call with committee counsel including Richard A. Marshack, Yosina Lissebeck, and Nick Koffroth;	1.20	740.00	888.00
8/09/24	DEH	Telephone conference with Alina N. Mamlyuk re: revising and supplementing Alteryx complaint;	.20	740.00	148.00
8/09/24	DEH	Written correspondence with Yosina Lissebeck and Richard A. Marshack re: summary and status of secured creditor litigation (.20); Written correspondence with Alina N. Mamlyuk re: supplementing Chapter 11 status report (.10);	.30	740.00	222.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
8/09/24	CM	Revise and finalize order granting Trustee's: omnibus objection to alleged secured claims that lack evidence of secured status; and motion to disallow or reclassify votes for confirmation purposes (.30); Draft e-mail to Bradford N. Barnhardt, Laila Masud, D. Edward Hays, Layla Buchanan and calendar clerk re: same (.10);	.40	340.00	136.00
8/12/24	DEH	Review Forbes article on LPG case (.30); Written correspondence with Richard A. Marshack and Christopher Celentino re: monitor e-mail to U.S. Trustee re: same (.10);	.40	740.00	296.00
8/12/24	DEH	Written correspondence with Aaron E. de Leest re: American Express claims;	.20	740.00	148.00
8/12/24	CVH	Review master litigation chart from Trustee (.20); E-mails re: same (.10); E-mails with Kathleen Frederick and Yosina Lissebeck re: status of transferee spreadsheet and letter templates (.30); Review LPG article and e-mails re: same (.20);	.80	600.00	480.00
8/12/24	DAW	Review and analyze multiple lengthy e-mail correspondence from Trustee and Aaron E. de Leest re: ongoing to do list for LPG litigation plans;	.20	610.00	122.00
8/13/24	CM	Revise and supplement first interim application for fees and costs (.10); Draft e-mail to Laila Masud, D. Edward Hays and accounting re: same (.10);	.20	340.00	68.00
8/14/24	DEH	Written correspondence with Alina N. Mamlyuk re: Chapter 11 status report;	.20	740.00	148.00
8/14/24	ANM	Drafting Trustee's status report to be filed 8/15/24 in advance of status conference on 8/29/24;	2.10	500.00	1,050.00
8/15/24	DEH	Telephone conference with Richard A. Marshack re: results of Beyrooti hearing and order granting attachment;	.20	740.00	148.00
8/15/24	DEH	Telephone conference with Richard A. Marshack and Yosina Lissebeck re: objections to confirmation, strategy for replies, and preparation for confirmation including witness preparation;	.90	740.00	666.00
8/15/24	DEH	Revise and supplement Chapter 11 status report;	1.40	740.00	1,036.00
8/15/24	ANM	Drafting status report for the 8/29/24 status conference;	2.70	500.00	1,350.00
8/15/24	ANM	Drafting (incorporating revision made by Yosina Lissebeck as well as today's Court's orders) status report for the August 29, 2024 status conference;	.70	500.00	350.00
8/16/24	DEH	Review and revise motion re: approval of agreement with Azure for use of cash collateral in exchange for replacement lien (.30); Review and revise proposed order re: same (.10); Written correspondence with Bradford N. Barnhardt and Layla Buchanan re: same (.10);	.50	740.00	370.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
8/16/24	DEH	Review and revise application for order shortening time re: motion to approve agreement with Azzure (.20); Review and revise proposed order granting same (.10); Review and revise declaration in support of request to shorten time (.10);	.40	740.00	296.00
8/17/24	DEH	Written correspondence with Nick Koffroth and Yosina Lissebeck re: motion to approve Azzure agreement (.20); Draft statement of terms re: agreement for use of cash collateral and replacement lien (.20); Written correspondence with Bradford N. Barnhardt and Layla Buchanan re: same (.10);	.50	740.00	370.00
8/19/24	LB	Conference with D. Edward Hays re: preparation of notice of order shortening time hearing on motion to approve stipulation re: cash collateral (.20); Draft notice of hearing on motion (.30); Provide telephonic notice pursuant to order shortening time (.30); Draft declaration re: notice of hearing (.30);	1.10	340.00	374.00
8/19/24	LM	Review written correspondences from Jeremy Freedman, Christopher Celentino and Christopher Ghio re: Greyson opposition re: confirmation brief;	.20	540.00	108.00
8/19/24	BNB	Telephone conference with Christopher Ghio re: taxpayer ID for Debtor for bond (.10); Search for taxpayer ID for debtor, and provide information to Christopher Ghio (.10);	.20	410.00	82.00
8/20/24	BNB	Continue drafting reply to Greyson Law parties' objection to plan confirmation;	8.30	410.00	3,403.00
8/21/24	DEH	Written correspondence with Jennifer McLaughlin and Alina N. Mamlyuk re: finalizing stipulation;	.10	740.00	74.00
8/21/24	KAT	E-mail correspondence with Richard A. Marshack re: Bayrooti property and quick review of records (.20);	.20	650.00	130.00
8/21/24	DAW	Review and analyze multiple e-mail correspondence from Trustee re: the Azure claims and reduction of secured claims;	.20	610.00	122.00
8/22/24	DEH	Written correspondence with Nick Koffroth re: reply brief in support of confirmation (.10); Written correspondence with Aaron E. de Leest re: same (.10);	.20	740.00	148.00
8/22/24	DEH	Research re: payments to Amtronics and whether its an insider;	.40	740.00	296.00
8/22/24	DEH	Telephone conference with Richard A. Marshack re: confirmation reply;	.20	740.00	148.00
8/22/24	DEH	Telephone conference with Richard A. Marshack and Aaron E. de Leest re: settlement of Blue Cross claim;	.20	740.00	148.00
8/23/24	DEH	Revise and finalize complaint against Alteryx (1.10); Written correspondence with Christopher Celentino and Richard A. Marshack re: same (.30);	1.40	740.00	1,036.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

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Date	Atty	Description	Hours	Rate	Amount
8/23/24	DEH	Telephone conference with Alina N. Mamlyuk re: revisions to Alteryx complaint;	.20	740.00	148.00
8/27/24	DEH	Review and analyze revised term sheet with Blue Cross (.20); Written correspondence with Richard A. Marshack and Aaron E. de Leest re: same (.10);	.30	740.00	222.00
8/27/24	CVH	E-mails re: denial of motion to continue (.10); Review order (.10); Review and memorandum of decision denying claim of Greyson Law Center (.40);	.60	600.00	360.00
8/28/24	AEd	Review Order Denying Greyson's Motion To Vacate The Preliminary Injunction;	.40	610.00	244.00
8/29/24	DEH	Meeting with Richard A. Marshack and Aaron E. de Leest re: objections to priority claims, avoidance actions, and [REDACTED];	1.50	740.00	1,110.00
8/29/24	CVH	Review LAW 360 article on recent rulings (.20) (No Charge);	.20	600.00	N/C
8/30/24	DEH	Telephone conference with Justin Draa re: claims against potential attorney defendants;	.20	740.00	148.00
8/30/24	DEH	Written correspondence with Richard A. Marshack and Aaron E. de Leest re: [REDACTED];	.20	740.00	148.00
8/30/24	LB	Draft order granting motion to approve compromise with Blue Cross;	.30	340.00	102.00
9/02/24	DEH	Written correspondence with Richard A. Marshack and Chad V. Haes re: status of negotiations re: Paronich and timing for filing complaint;	.20	740.00	148.00
9/04/24	DEH	Meeting with [REDACTED];	2.50	740.00	1,850.00
9/04/24	DEH	Travel time to and from meeting with [REDACTED] (No Charge);	.80	740.00	N/C
9/04/24	DAW	Multiple conferences with D. Edward Hays and Aaron E. de Leest re: ongoing investigations and meetings today;	.60	610.00	366.00
9/06/24	DEH	Written correspondence with Richard A. Marshack, Christopher Celentino, and Yosina Lissebeck re: response to Dan Connolly;	.30	740.00	222.00
9/06/24	DEH	Conference call with Committee counsel;	.60	740.00	444.00
9/09/24	DEH	Telephone conference with Richard A. Marshack re: Alteryx settlement offer and strategy for response (.20); Telephone conference to Alina N. Mamlyuk re: same (.10);	.30	740.00	222.00
9/09/24	DEH	Telephone conference with Richard A. Marshack re: litigation claims against Alteryx, analysis of Alteryx's proposed walk away, and counter-offer;	.20	740.00	148.00
9/09/24	DEH	Telephone conference with the Richard A. Marshack and Alina N. Mamlyuk re: strategy for settlement for Alteryx administrative claim.	.90	740.00	666.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/09/24	DEH	Telephone conference with Richard A. Marshack re: debrief of call with Andrew Snell re: litigation claims against Aleryx, its alleged defenses, discovery issues, and settlement strategy;	.50	740.00	370.00
9/09/24	DEH	Written correspondence with Richard A. Marshack, Christopher Celentino, Christopher Ghio, Yosina Lissebeck, and Alina N. Mamlyuk re: electing district court for Kay March appeals;	.20	740.00	148.00
9/10/24	DEH	Review written correspondence from Tony Diab re: request for meeting to discuss settlement (.10); Written correspondence with Richard A. Marshack, Christopher Celentino, and Christopher Ghio re: same and terms of response (.20); Review written correspondence from Richard A. Marshack to Tony Diab re: same (.10);	.40	740.00	296.00
9/11/24	DEH	Telephone conference with Richard A. Marshack and Christopher Ghio re: appeals, responsibility for deadlines and briefs, and whether to elect district court (.50); Written correspondence with Alina N. Mamlyuk and Layla Buchanan re: drafting notice of election, reviewing designation of record and determining whether to designate additional items, and notice of transcripts (.20);	.70	740.00	518.00
9/11/24	BNB	Review order to show cause to Daniel March in California Superior Court cases;	.40	410.00	164.00
9/11/24	AEd	Review written correspondence from Keith Owens re: settlement agreement and draft written correspondence to Dan Gonzalez re: settlement agreement;	.20	610.00	122.00
9/13/24	DEH	Written correspondence with Richard A. Marshack and Alina N. Mamlyuk re: extension to Alteryx;	.10	740.00	74.00
9/13/24	DEH	Review entered order denying approval of stipulation (.10); Written correspondence with Richard A. Marshack and Christopher Celentino re: same (.10);	.20	740.00	148.00
9/13/24	DAW	Review and analyze multiple e-mail correspondence from Trustee and D. Edward Hays re: election of any appeal from Kay March to District Court;	.20	610.00	122.00
9/19/24	DEH	Review and analyze complaint against Ashlee Colonna Cohen (.30); Research re: Section 502(b)(4) claim to disallow amount of claim filed by former counsel to debtor to the extent the claim exceeds the reasonable value of services (.30); Written correspondence with Christopher Celentino, Yosina Lissebeck, Tyler Powell, Richard A. Marshack, and Aaron E. de Leest re: same (.20);	.80	740.00	592.00
9/19/24	DEH	Written correspondence with Ashlee Colonna Cohen re: complaint and retention of counsel (.10); Written correspondence with Caroline Djang re: same (.10);	.20	740.00	148.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/19/24	AEd	Review written correspondence from Dan Gonzalez re: settlement agreement and revise written settlement agreement and draft written response to Dan Gonzalez and Trustee and review multiple responses and respond;	.90	610.00	549.00
9/19/24	AEd	Review written correspondence from D. Edward Hays and Yosina Lissebeck re: additional claim for relief and amending Ashlee Colonna Cohen complaint and review responses from Christopher Celentino re: same;	.20	610.00	122.00
9/20/24	DEH	Telephone conference with staff re: subpoena served on Trustee by CPFB and categories of documents sought (.20); Telephone conference with Aaron E. de Leest re: same, CPFB's failure to comply with Barton by obtaining prior leave of court, and response to same (.20);	.40	740.00	296.00
9/23/24	DEH	Written correspondence with Lori Ensley, Yosina Lissebeck, and other counsel re: possible additional address used by LPG on Golden Circle in Santa Ana;	.20	740.00	148.00
9/23/24	LB	(Adv. Bayrooti) Review and finalize subpoena to US Bancorp Advisors (.20); Draft correspondence to attorney service re: same (.10);	.30	340.00	102.00
9/23/24	LB	(Adv. Bayrooti) Review and finalize subpoena to U.S. Bank (.20); Draft correspondence to attorney service re: same (.10);	.30	340.00	102.00
9/23/24	LB	(Adv. Bayrooti) Review and finalize subpoena to Charles Schwab (.20); Draft correspondence to attorney service re: same (.10);	.30	340.00	102.00
9/23/24	BNB	Telephone conference with Layla Buchanan re: service of subpoenas in Leucadia adversary proceeding;	.10	410.00	41.00
Sub-Total Fees:			56.30		\$ 34,736.00

12 Plan and Disclosure Statement

Date	Atty	Description	Hours	Rate	Amount
8/01/24	DEH	Written correspondence with Christopher Celentino re: settlement issues and strategy with Azzure;	.30	740.00	222.00
8/01/24	DEH	Telephone conference with Bradford N. Barnhardt re: review of confirmation brief and ballot tabulation declaration;	.10	740.00	74.00
8/01/24	DEH	Telephone conferences with Kim Steverson re: revisions to ballot declaration and tabulation;	.20	740.00	148.00

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Date	Atty	Description	Hours	Rate	Amount
8/01/24	DEH	Telephone conference with Yosina Lissebeck re: revisions to plan confirmation brief and settlement with OHP;	.20	740.00	148.00
8/01/24	DEH	Review final version of confirmation brief (.30); Written correspondence with Nick Koffroth, Richard A. Marshack, and Yosina Lissebeck re: same (.20);	.50	740.00	370.00
8/01/24	DEH	Revise and finalize declaration of D. Edward Hays re: ballot tally (.20); Written correspondence with Nick Koffroth, Richard A. Marshack, and Yosina Lissebeck re: same (.10);	.30	740.00	222.00
8/01/24	DEH	Review and analyze Trustee's proposed revisions to declaration in support of confirmation (.20); Written correspondence with Yosina Lissebeck and Nick Koffroth re: same (.10); Written correspondence with Richard A. Marshack re: same (.10);	.40	740.00	296.00
8/01/24	LM	Telephone conference with Bradford N. Barnhardt re: draft of confirmation brief;	.10	540.00	54.00
8/01/24	BNB	Telephone conference with Laila Masud re: draft of confirmation brief;	.10	410.00	41.00
8/01/24	BNB	Telephone conference with Pam Kraus re: cash on hand from postpetition collections;	.10	410.00	41.00
8/01/24	BNB	Written correspondence with Layla Buchanan re: forthcoming e-mail from Kim Steverson re: ballot tabulation;	.10	410.00	41.00
8/01/24	BNB	Telephone conference with D. Edward Hays re: review of confirmation brief and ballot tabulation declaration;	.10	410.00	41.00
8/01/24	BNB	Review e-mail from Nick Koffroth re: confirmation brief;	.10	410.00	41.00
8/01/24	BNB	Written correspondence with D. Edward Hays re: status of draft of confirmation brief;	.10	410.00	41.00
8/01/24	BNB	Telephone conference with Richard A. Marshack and Yosina Lissebeck re: review of confirmation brief;	.10	410.00	41.00
8/01/24	BNB	Written correspondence with Pam Kraus and Dinsmore team re: amount of "Post-Petition Funds," including review of accounting report circulated by Pam Kraus;	.30	410.00	123.00
8/01/24	BNB	Figure out cash on hand amount for Trustee's declaration in support of confirmation brief, including written correspondence with Pam Kraus and telephone conference with Trustee administrator re: same;	.30	410.00	123.00
8/01/24	BNB	Review and revise draft of confirmation brief;	.90	410.00	369.00
8/01/24	DND	E-mail correspondence to D. Edward Hays re: edits to declaration to Kim Steverson declaration before filing final version;	.10	360.00	36.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
8/01/24	DND	E-mail correspondence from Kim Steverson re: ballot tabulation updating; E-mail correspondence re: same updated; review of final version;	.30	360.00	108.00
8/01/24	DND	E-mail correspondence from Kim Steverson and Nick Koffroth re: revised voting declaration, additional vote of MNS Class 1F creditor to be added to tabulation and declaration (.20); E-mail correspondence from D. Edward Hays re: his declaration (.10);	.30	360.00	108.00
8/02/24	DEH	Research re: requirement that motion required to change vote on plan and standards established by case law (.40); Written correspondence with Richard A. Marshack, Christopher Celentino, and Yosina Lissebeck re: same (.20);	.60	740.00	444.00
8/08/24	DND	Review of memorandum of law in support of plan;	.90	360.00	324.00
8/08/24	DND	Review objection to Plan filed by Kathleen March;	.40	360.00	144.00
8/09/24	BNB	Written correspondence with D. Edward Hays and Alina N. Mamlyuk re: preparing status report;	.10	410.00	41.00
8/12/24	DEH	Telephone conference with Richard A. Marshack re: plan confirmation issues and evidence;	.50	740.00	370.00
8/12/24	DAW	Conference with Trustee re: Plan confirmation issues;	.20	610.00	122.00
8/13/24	DEH	Telephone conference with Richard A. Marshack re: Blue Cross objection to plan confirmation;	.20	740.00	148.00
8/13/24	DEH	Review and analyze objection to confirmation filed by Blue Cross (.40); Written correspondence with Richard A. Marshack, Yosina Lissebeck, and Nick re: same (.10);	.50	740.00	370.00
8/13/24	AEd	Review written correspondence from D. Edward Hays re: Blue Cross objection to plan confirmation;	.10	610.00	61.00
8/14/24	DEH	Telephone conference with Bradford N. Barnhardt re: drafting reply to Kay March's objection to plan confirmation;	.10	740.00	74.00
8/14/24	DEH	Telephone conference with Richard A. Marshack re: objections to confirmation;	.20	740.00	148.00
8/14/24	DEH	Zoom meeting with Richard A. Marshack, Aaron E. de Leest, and Yosina Lissebeck re: objection to Blue Cross claim, strategy for reply to BC's objection to confirmation, and response to Kay March's objection to confirmation, witness preparation for confirmation hearing, and other litigation issues;	.90	740.00	666.00
8/14/24	BNB	Telephone conference with D. Edward Hays re: drafting reply to Kay March's objection to plan confirmation;	.10	410.00	41.00
8/14/24	AEd	Review Blue Cross Objection to Plan Confirmation and conduct research re: same;	2.00	610.00	1,220.00

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Date	Atty	Description	Hours	Rate	Amount
8/15/24	DEH	Telephone conference with Richard A. Marshack re: preparation for confirmation hearing;	.20	740.00	148.00
8/16/24	DEH	Telephone conference with Richard A. Marshack re: objection to confirmation filed by Golubow and reply to same (.20); Written correspondence with Richard A. Marshack and Christopher Celentino re: same (.20);	.40	740.00	296.00
8/16/24	DEH	Written correspondence with Nick Koffroth and Yosina Lissebeck re: motion to approve agreement with Azzure and conference to discuss plan objections and reply briefs;	.20	740.00	148.00
8/16/24	DEH	Review and analyze objection to confirmation filed by Golubow;	.30	740.00	222.00
8/16/24	DEH	Written correspondence with Aaron E. de Leest, accountants, payroll processing companies, and others re: discovery related to when LPG employees ceased being employed by debtor to determine if estate has factual arguments to object to Blue Cross's priority claim and to respond to its objection to confirmation;	.30	740.00	222.00
8/16/24	DEH	Written correspondence with Chad Kurtz re: preparation for confirmation hearing and seeking leave of court for witnesses to appear remotely;	.20	740.00	148.00
8/16/24	DAW	Review, analyze, and revise the proposed status report on the Plan and the various other matters including, but not limited to administrative expenses, and potential litigation;	1.10	610.00	671.00
8/17/24	DEH	Written correspondence with Richard A. Marshack and Christopher Celentino re: response to Golubow's objection;	.20	740.00	148.00
8/19/24	DEH	Telephone conference with Richard A. Marshack and Christopher Celentino re: response to objections to confirmation, defenses to Blue Cross, status of settlement negotiations with Beyrooti, and fee applications;	.50	740.00	370.00
8/19/24	DEH	Telephone conference with Richard A. Marshack re: replies to plan objections;	.20	740.00	148.00
8/19/24	DAW	Conference with Trustee re: upcoming plan confirmation and strategy thereto;	.40	610.00	244.00
8/19/24	LM	Telephone conference with Bradford N. Barnhardt re: drafting reply to Han Trinh confirmation objection;	.10	540.00	54.00
8/19/24	BNB	Telephone conference with Laila Masud re: drafting reply to Han Trinh confirmation objection;	.10	410.00	41.00
8/19/24	BNB	Draft reply to Han Trinh's objection to plan confirmation;	4.70	410.00	1,927.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
8/20/24	DEH	Conference call with Nick Koffroth, Keith Owens, Adam Meislik, and Chad Kurtz re: confirmation issues, strategies for replies to oppositions to confirmation, objection to claim filed by Blue Cross and possible avoidance actions against it, and dating down liquidation analysis;	.80	740.00	592.00
8/20/24	DEH	Telephone conference with Richard A. Marshack re: administrative and priority claims;	.20	740.00	148.00
8/20/24	DEH	Telephone conference with Laila Masud re: admin professionals fees;	.10	740.00	74.00
8/20/24	DEH	Telephone conference with Richard A. Marshack re: confirmation issues and strategy, call with committee counsel, action items, and responses to feasibility objections;	.40	740.00	296.00
8/20/24	LM	Review lengthy written correspondence from Chad Kurtz re: updated POL projections (.20); Written correspondence to Bradford N. Barnhardt re: same (.10) (No Charge);	.20	540.00	108.00
8/20/24	BNB	Telephone conference with Laila Masud re: amount of administrative claims;	.10	410.00	41.00
8/21/24	DEH	Telephone conference with Richard A. Marshack re: confirmation issues and points for reply briefs;	.30	740.00	222.00
8/21/24	DEH	Telephone conference with Richard A. Marshack re: reply brief and responses to Kay March's objections;	.60	740.00	444.00
8/21/24	LM	Telephone conference with Bradford N. Barnhardt re: amount of Dinsmore's fees for plan confirmation reply;	.10	540.00	54.00
8/21/24	BNB	Telephone conference with Aaron E. de Leest re: status of plan confirmation replies;	.10	410.00	41.00
8/21/24	BNB	Telephone conference with Laila Masud re: amount of Dinsmore's fees for plan confirmation reply;	.10	410.00	41.00
8/21/24	BNB	Continue drafting reply to the Greyson Law/Trinh objection to plan confirmation;	2.60	410.00	1,066.00
8/21/24	AEd	Research re: Priority Benefits Claim under 5079(a)(5) and outline and begin preparing response to Blue Cross Objection to Plan;	1.20	610.00	732.00
8/21/24	AEd	Telephone conference with Bradford N. Barnhardt re: reply in support of confirmation of plan;	.10	610.00	61.00
8/21/24	AEd	Review and revise Trustee's omnibus reply in support of plan confirmation;	1.60	610.00	976.00
8/21/24	AEd	Review written correspondence from Bradford N. Barnhardt re: reply to Insiders's Objection to LPG plan confirmation;	.10	610.00	61.00
8/22/24	DEH	Revise and revise reply briefs in support of confirmation;	1.70	740.00	1,258.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
8/22/24	DEH	Telephone conference with Richard A. Marshack re: potential for witness testimony during confirmation hearing;	.40	740.00	296.00
8/22/24	DEH	Telephone conference with Richard A. Marshack re: investigator retained by Kay March;	.50	740.00	370.00
8/22/24	DEH	Telephone conference with Richard A. Marshack re: investigator contacting Trustee's former spouse at her home;	.20	740.00	148.00
8/22/24	DEH	Further telephone conferences with Richard A. Marshack and Yosina Lissebeck re: investigator and issues re: same;	.70	740.00	518.00
8/22/24	DEH	Telephone conference with Richard A. Marshack re: revisions to reply brief;	.30	740.00	222.00
8/22/24	DEH	Telephone conference with Nick Koffroth re: revisions to reply brief (.20); Telephone conference with Yosina Lissebeck re: same (.10);	.30	740.00	222.00
8/22/24	DEH	Telephone conferences with Richard A. Marshack re: final revisions to reply brief;	.40	740.00	296.00
8/22/24	DAW	Conference with Trustee re: recent events and strategy for Plan confirmation;	.30	610.00	183.00
8/22/24	LM	Review written correspondence from Chad Kurtz, Yosina Lissebeck and Christopher Celentino re: projections and impact of reserve re: Bayrooti and Bridge;	.20	540.00	108.00
8/22/24	LM	Conferences (x2) with Layla Buchanan re: reply in support of of confirmation brief status;	.20	540.00	108.00
8/22/24	BNB	Written correspondence with D. Edward Hays re: review of reply in support of confirmation objection;	.10	410.00	41.00
8/22/24	BNB	Draft evidentiary objections to declaration of Kathleen P. March re: confirmation, and written correspondence with D. Edward Hays re: same;	2.70	410.00	1,107.00
8/22/24	AEd	Review committee's draft omnibus reply in support of plan confirmation and in response to objections to plan;	.90	610.00	549.00
8/22/24	AEd	Review memo from D. Edward Hays re: omnibus reply in support of plan confirmation;	.10	610.00	61.00
8/22/24	AEd	Review written correspondence from Bradford N. Barnhardt re: evidentiary objections to the Declaration of Kathleen P. March, brief review of evidentiary objections, and written correspondence from D. Edward Hays re: same;	.30	610.00	183.00
8/23/24	DEH	Telephone conference with Richard A. Marshack re: feasibility issues;	.20	740.00	148.00
8/23/24	DEH	Conference call with Trustee and committee counsel re: preparation and strategy for confirmation hearing (1.0); Telephone conference with Richard A. Marshack re: follow-up and action items (.20);	1.20	740.00	888.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
8/23/24	DEH	Telephone conference with Richard A. Marshack re: witness preparation for confirmation hearing;	.20	740.00	148.00
8/23/24	DAW	Multiple conferences with Trustee re: Plan confirmation issues;	.20	610.00	122.00
8/23/24	DAW	Review and respond to the collective re: ongoing strategy for Plan confirmation;	.20	610.00	122.00
8/23/24	BNB	Review filed brief in response to Greyson/Trinh confirmation objection;	.10	410.00	41.00
8/26/24	DEH	Conference call with Nick Koffroth, Chad Kurtz, Yosina Lissebeck, and Kim Steverson re: preparation for plan confirmation hearing;	1.00	740.00	740.00
8/26/24	DAW	Conference with Trustee re: preparation for Plan confirmation hearing on Thursday and strategy thereto;	.40	610.00	244.00
8/26/24	BNB	Review order denying Greyson Law/Trinh motion to continue confirmation hearing;	.10	410.00	41.00
8/27/24	DEH	Telephone conference with Richard A. Marshack re: feasibility analysis;	.20	740.00	148.00
8/27/24	DAW	Conference with Trustee re: administrative claims decisions and strategy or plan confirmation;	.40	610.00	244.00
8/28/24	DEH	Review and analyze plan, disclosure statement, confirmation brief, multiple objections, omnibus reply and prepare detailed outline of facts and arguments for hearing including citations to the record, exhibits, and quotes from statutes and case law;	6.70	740.00	4,958.00
8/28/24	DEH	Prepare for and conference call with Richard A. Marshack, Yosina Lissebeck, Nick Koffroth, Keith Owens, Adam Meislik, and Chad Kurtz re: final updates to feasibility analysis and strategy for confirmation hearing;	1.40	740.00	1,036.00
8/28/24	AEd	Zoom conference with D. Edward Hays, Richard A. Marshack, committee counsel, and special counsel re: confirmation hearing preparation;	1.10	610.00	671.00
8/28/24	AEd	Review written correspondence from D. Edward Hays and updated plan projections;	.20	610.00	122.00
8/29/24	DEH	Court appearance at United States Bankruptcy Court, Santa Ana re: confirmation hearing, status conference, and related hearings including one hour meeting after court with counsel for committee and Trustee's special counsel re: hearing results, status of pending avoidance action, and other case issues;	7.40	740.00	5,476.00
8/29/24	DEH	Revise, refine, and supplement outline for confirmation hearing;	2.20	740.00	1,628.00
8/29/24	DEH	Telephone conference with Richard A. Marshack re: strategy for confirmation hearing;	.60	740.00	444.00

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Date	Atty	Description	Hours	Rate	Amount
8/29/24	DAW	Review and analyze multiple articles and information provided by the Trustee re: the Court's recent rulings and strategy for today;	.40	610.00	244.00
8/29/24	DND	Listen in on portion of confirmation hearing (No Charge);	2.10	360.00	N/C
8/30/24	DEH	Conference call with Nick Koffroth, Keith Owens, Yosina Lissebeck, and Christopher Ghio re: form and provisions of confirmation order, litigation claims, settlement issues with Beyrooti, post-confirmation issues, effective date, etc.;	.80	740.00	592.00
8/30/24	DEH	Telephone conference with Richard A. Marshack re: revisions to form of proposed confirmation order and issues from standing conference call with committee counsel;	.40	740.00	296.00
8/30/24	DEH	Review and revise draft 30-page confirmation order (.80); Written correspondence with Trustee, Trustee's special counsel, and committee counsel re: same (.10);	.90	740.00	666.00
8/30/24	DEH	Telephone conference with Nick Koffroth re: revisions to order and finalizing language re: same;	.20	740.00	148.00
8/30/24	DEH	Review and analyze committee's further proposed revisions and written correspondence with Nick Koffroth re: same;	.30	740.00	222.00
8/30/24	DEH	Review and analyze final revisions proposed by committee and written correspondence with Nick Koffroth re: approval of same and proceeding to lodgment;	.30	740.00	222.00
8/30/24	DEH	Telephone conference with Richard A. Marshack re: approval of final form of proposed confirmation order;	.20	740.00	148.00
8/30/24	DAW	Analyze post-confirmation items to do and allocation of resources for same;	.60	610.00	366.00
8/31/24	DEH	Written correspondence with Christopher Celentino re: form and provisions of order confirming plan;	.20	740.00	148.00
8/31/24	DEH	Draft list of tasks triggered off entry of confirmation order including service of notice of confirmation and notice of effective date, need for creation of list of parties and amounts to be paid upon the effective date including secured creditors, super-priority administrative claimants, priority creditors so payments can be timely made, and filing of notice of errata re: lodged confirmation order that inadvertently did not attach the three referenced exhibits (.40); Written correspondence with Trustee, Trustee's special counsel, committee counsel, and Omni re: same (.20);	.60	740.00	444.00
8/31/24	DEH	Written correspondence with Kim Stevenson re: preparation for service of notice of entry of confirmation order and notice of effective date and procedure for service on consumers by e-mail;	.10	740.00	74.00
9/03/24	AEd	Review written correspondence from D. Edward Hays re: confirmation order;	.10	610.00	61.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/05/24	DEH	Telephone conferences with Richard A. Marshack re: final revisions to confirmation order (.20); Written correspondence with Nick Koffroth and review revised order (.20);	.40	740.00	296.00
9/05/24	DEH	Telephone conference with Nick Koffroth re: revisions to confirmation order and re: -lodging;	.20	740.00	148.00
9/06/24	DEH	Telephone conference with Richard A. Marshack re: response to Dan Connolly;	.20	740.00	148.00
9/10/24	LB	Conference with Laila Masud re: confirmation order and requirements;	.30	340.00	102.00
9/10/24	LM	Written correspondences with Kim Steverson re: confirmation order servicing (.10); Written correspondence with Layla Buchanan re: same (.10); Conference with Layla Buchanan re: same (.10);	.30	540.00	162.00
9/11/24	DEH	Written correspondence with Yosina Lissebeck, Aaron E. de Leest, and Pam Kraus re: list of effective date payments and timing for cutting checks;	.30	740.00	222.00
9/11/24	DEH	Review and analyze plan and Written correspondence with Aaron E. de Leest re: calculation of effective date and whether payments must be made prior to, on, or immediately after (.30); Written correspondence with Nick Koffroth re: same (.10);	.40	740.00	296.00
9/11/24	LB	Conference with Aaron E. de Leest re: preparation of materials for hearing on confirmation of chapter 11 plan (.10); Preparation of hearing binder re: same (.30);	.40	340.00	136.00
9/11/24	LM	Review written correspondences (x6) from D. Edward Hays, Pam Kraus and Aaron E. de Leest re: effective date payments;	.20	540.00	108.00
9/11/24	BNB	Review e-mail correspondence between D. Edward Hays and Pam Kraus re: effective date payments;	.10	410.00	41.00
9/11/24	AEd	Telephone conference with Nick Koffroth re: Notice of Entry of Confirmation Order;	.10	610.00	61.00
9/11/24	AEd	Review notice of confirmation order and Plan re: notice of rejection and plan supplement and draft written correspondence to Nick Koffroth re: Plan Supplement and notice of rejection;	.80	610.00	488.00
9/11/24	AEd	Draft written correspondence to Pam Kraus re: timing of plan payments and effective date payments with respect to plan classes and review response;	1.10	610.00	671.00
9/11/24	AEd	Review written correspondence from Richard A. Marshack, D. Edward Hays and Pam Kraus re: effective date payments;	.10	610.00	61.00
9/12/24	DEH	Review form of notice of entry of confirmation and written correspondence with Kim Steverson and Aaron E. de Leest re: same;	.20	740.00	148.00

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Date	Atty	Description	Hours	Rate	Amount
9/12/24	DAW	Pursuant to the request of the Trustee review and analyze the Plan provisions and confirmation order for upcoming deadlines and structure;	2.20	610.00	1,342.00
9/12/24	BNB	Review e-mail correspondence from Pam Kraus re: estimated effective date payments;	.10	410.00	41.00
9/12/24	AEd	Review written correspondence from Pam Kraus and Richard A. Marshack re: estimated plan payments;	.20	610.00	122.00
9/12/24	AEd	Review written correspondence from Kim Steverson re: notice of confirmation order;	.10	610.00	61.00
9/12/24	AEd	Review notice of confirmation order and execute same and draft written correspondence to committee counsel re: filing notice;	.30	610.00	183.00
9/13/24	DEH	Conference call with Nick Koffroth, Keith Owens, and Christopher Celentino re: implementation of plan, tasks to do pursuant to confirmation, objections to priority claims, and negotiations to resolve fee objections;	.90	740.00	666.00
9/13/24	LM	Written correspondence with Aaron E. de Leest, Pam Kraus and Kim Steverson re: service on third parties of confirmation order and world of service;	.10	540.00	54.00
9/13/24	AEd	Review docket and draft memo to D. Edward Hays re: no appeal from confirmation order;	.10	610.00	61.00
9/13/24	AEd	Review written correspondence from Pam Kraus re: notice of entry of confirmation order and respond;	.10	610.00	61.00
9/13/24	AEd	Review written correspondence from Kim Steverson re: service of notice of confirmation order and review confirmation order re: same and draft written response;	.50	610.00	305.00
9/13/24	AEd	Review written correspondence from Tyler Powell re: estimated plan payments and review response from Pam Kraus re: same;	.20	610.00	122.00
9/13/24	AEd	Draft written correspondence to Kim Steverson re: Service of Notice of Entry of Confirmation Order and respond;	.20	610.00	122.00
9/14/24	DEH	Written correspondence with Richard A. Marshack and counsel re: effective date tasks;	.20	740.00	148.00
9/14/24	BNB	Review e-mail correspondence between D. Edward Hays and Yosina Lissebeck re: steps to take before effective date;	.10	410.00	41.00
9/16/24	DEH	Telephone conference with Pam Kraus re: effective date payments, liquidating accounts to pay same, and timing for checks (.20); Telephone conference with Richard A. Marshack and Pam Kraus re: same (.50);	.70	740.00	518.00

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Date	Atty	Description	Hours	Rate	Amount
9/17/24	DEH	Written correspondence with Richard A. Marshack, Pam Kraus, Alina N. Mamlyuk, and Aaron E. de Leest re: timing for effective date payments;	.20	740.00	148.00
9/17/24	DEH	Conference call with Yosina Lissebeck, Tyler Powell, Aaron E. de Leest, and Bradford N. Barnhardt re: effective date payments, objections to claims, and other deadlines triggered by confirmation;	.40	740.00	296.00
9/17/24	BNB	Attend conference call with D. Edward Hays and Dinsmore team re: effective date;	.50	410.00	205.00
9/17/24	AEd	Review written correspondence from Kim Steverson re: Notice of Plan Confirmation;	.10	610.00	61.00
9/18/24	AEd	Review confirmation order and plan for effective date issues and draft written correspondence to Yosina Lissebeck re: same;	.70	610.00	427.00
9/18/24	AEd	Review confirmation order and plan re: effective date issues;	1.20	610.00	732.00
9/18/24	AEd	Review written correspondence from Yosina Lissebeck re: Plan Supplement timing, review confirmation order and plan terms re: same, and draft written response;	.30	610.00	183.00
9/19/24	AEd	Draft written correspondence to Nick Koffroth re: Plan Supplement;	.20	610.00	122.00
9/23/24	DEH	Review and revise notice of rejection (.30); Written correspondence with Nick Koffroth re: same (.20);	.50	740.00	370.00
9/23/24	DEH	Review and revise notice of effective date (.20); Written correspondence with Nick Koffroth and Aaron E. de Leest re: same (.10);	.30	740.00	222.00
9/23/24	AEd	Draft written correspondence to Kim Steverson re: proof of service for notice of confirmation order and review responses and affidavit of service;	.50	610.00	305.00
Sub-Total Fees:			85.60		\$ 53,133.00

14 523/727 Litigation

Date	Atty	Description	Hours	Rate	Amount
8/02/24	BNB	Telephone conference with Laila Masud re: confirmation brief and issues in case;	.10	410.00	41.00
Sub-Total Fees:			.10		\$ 41.00

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15 Avoidance Actions

Date	Atty	Description	Hours	Rate	Amount
8/01/24	CVH	E-mails with Yosina Lissebeck re: updated spreadsheet (.10); Review spreadsheet and notes from prior call to determine list of topics for meeting (.40); Analyze research from Grobstein Teeple re: avoidable transfers to determine demand letter format (.50); Conference and e-mails with Laila Masud and Yosina Lissebeck re: fraudulent transfer chart and update call (.20); Avoidance action update call with Yosina Lissebeck (.30);	1.50	600.00	900.00
8/01/24	LM	Telephone conference with Chad V. Haes re: fraudulent transfer chart and circulation to Yosina Lissebeck (.10); Draft written correspondence to Yosina Lissebeck re: same (.10);	.20	540.00	108.00
8/07/24	CVH	Review section 549 chart and spreadsheets to prepare for call with Kathleen Frederick (.20); Conference with Kathleen Frederick re: adding additional information to spreadsheets (.40); E-mails with Kathleen Frederick and Nick Cooper re: same (.10); E-mails and telephone calls re: case status (.30);	1.00	600.00	600.00
8/07/24	KF	Telephone call with Chad V. Haes re: additional 549 targets and preparation of lists for demand letters;	.40	290.00	116.00
8/07/24	KF	Condense lists of targets;	1.00	290.00	290.00
8/08/24	KF	Condense lists of targets for demand/fact finding letters;	.50	290.00	145.00
8/15/24	CVH	Review correspondence to prepare for conference call (.10); E-mails and telephone calls with Yosina Lissebeck and Kathleen Frederick re: status of letters and conference call (.30);	.40	600.00	240.00
8/15/24	KF	Complete condensing of target information into full spreadsheet for production of demand letters;	2.00	290.00	580.00
8/22/24	CVH	Review updated target spreadsheet to assess functionality and ease of use (.40); E-mails with Yosina Lissebeck, Kathleen Frederick, and Devon de Los Reyes re: demand letters (.40); Conference call with Kathleen Frederick and Devon de Los Reyes re: demand letters (.40);	1.20	600.00	720.00
8/22/24	DND	E-mail correspondence with Chad V. Haes, Kathleen Frederick, Yosina Lissebeck, Brandon Lira re: drafting letters for preferential and fraudulent transfers, scheduling telephone conference re: same;	.30	360.00	108.00
8/22/24	DND	Telephone conference with Chad V. Haes and Kathleen Frederick re: sending target letters for preferential and fraudulent transfers;	.40	360.00	144.00
8/23/24	DND	Review e-mail correspondence from Alina N. Mamlyuk to Jeremy Freedman re: review of Alteryx complaint;	.10	360.00	36.00

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Date	Atty	Description	Hours	Rate	Amount
8/23/24	DND	Review e-mail correspondence between D. Edward Hays, Christopher Celentino, Christopher Ghio, Jeremy Freedman, Yosina Lissebeck re: factual allegations in Alteryx complaint;	.60	360.00	216.00
8/23/24	DND	Review e-mail correspondence from Alina N. Mamlyuk to D. Edward Hays re: Alteryx post-petition transfers and letter of creditor draws;	.10	360.00	36.00
8/23/24	DND	Review of revised complaint against Alteryx;	.40	360.00	144.00
8/23/24	DND	Review e-mail correspondence from Andrew Still re: conversation re: transfers to Alteryx;	.10	360.00	36.00
8/26/24	CVH	E-mails with Kathleen Frederick and Robert Simmons re: status of completion of tasks related to letters (.30);	.30	600.00	180.00
8/26/24	DND	Review e-mail correspondence between Kathleen Frederick and Robert Simmons re: contact information for potential preferential transfer and fraudulent transfer recipients;	.20	360.00	72.00
8/26/24	DND	E-mail correspondence from Chad V. Haes and Kathleen Frederick re: dividing letters to send re: fraudulent and preferential transfers; E-mail correspondence to Robert Simmons;	.20	360.00	72.00
8/26/24	DND	Review e-mail correspondence between Alina N. Mamlyuk and Andrew Still re: phone call to discuss Alteryx transfers;	.20	360.00	72.00
8/26/24	DND	Review e-mail correspondence between Jeremy Freedman and Alina N. Mamlyuk re: proposed changes to Alteryx complaint (.10); Review of proposed changes (.30);	.40	360.00	144.00
8/26/24	DND	Review and analyze e-mail correspondence from Alina N. Mamlyuk to Yosina Lissebeck re: overview of telephone conference with Andrew Still re: Alteryx complaint;	.20	360.00	72.00
8/26/24	DND	Review e-mail correspondence from Alina N. Mamlyuk to Andrew Still re: scheduling settlement discussion; filing of adversary complaint; modifying briefing schedule;	.10	360.00	36.00
8/27/24	DND	Review e-mail correspondence from Andrew Still re: settlement negotiations and Alteryx view on transfers and LOC drawdown;	.20	360.00	72.00
8/28/24	CVH	E-mails with Robert Phillips and Kathleen Frederick re: address searches (.10);	.10	600.00	60.00
8/28/24	DND	Review of e-mail correspondence between Robert Simmons and Kathleen Frederick re: contact information for recipients of potential fraudulent and preferential transfers;	.30	360.00	108.00
8/28/24	DND	Annotating working excel sheet for reference in drafting letters re: potential preferential and fraudulent transfers;	.50	360.00	180.00

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Date	Atty	Description	Hours	Rate	Amount
8/29/24	CVH	E-mails with Kathleen Frederick and Robert Simmons re: target list (.10); Review target list subdivided into categories for each drafter (.20); E-mails with Kathleen Frederick and Devon de los Reyes re: demand letters (.30); Attend avoidance action conference call (.20);	.80	600.00	480.00
8/29/24	DND	E-mail correspondence with Chad V. Haes and Kathleen Frederick re: starting to draft letters re: fraudulent and preferential transfers;	.40	360.00	144.00
8/30/24	CVH	Review 6 demand letter templates from Dinsmore (.60);	.60	600.00	360.00
9/03/24	CVH	Review and analyze updated target spreadsheet (.40); E-mails with Kathleen Frederick re: questions related to various entries (.60);	1.00	600.00	600.00
9/03/24	DND	E-mail correspondence with Chad V. Haes and Kathleen Frederick re: information re: transfer recipients that appear in more than one category re: preferential and fraudulent transfers, information received from Grobstein Teeple;	.20	360.00	72.00
9/04/24	CVH	E-mails with Kathleen Frederick, Dimple Mehra, and Nick Cooper re: issues related to list of transfers (.30); E-mails with Devan de los Reyes re: demand letters (.10); Further revise demand letter templates and e-mails re: same (2.20);	2.60	600.00	1,560.00
9/04/24	DND	Draft preferential and fraudulent transfers letters;	1.70	360.00	612.00
9/04/24	DND	Review e-mail correspondence between Chad V. Haes and Grobstein Teeple re: verification of number of potential preferential and fraudulent transfers and dollar amounts of same;	.30	360.00	108.00
9/04/24	DND	Review e-mail correspondence between Alina N. Mamlyuk and Andrew Still re: rescheduling call re: Alteryx claims and settlement discussion;	.10	360.00	36.00
9/04/24	DND	E-mail correspondence from Chad V. Haes re: amending preferential and fraudulent transfer letter templates;	.20	360.00	72.00
9/05/24	CVH	Further revise demand letter templates (.50); E-mails with Devan de los Reyes and Kathleen Frederick re: clarifications and questions related to letters and spreadsheet (.40); Draft and revise 23 demand letters (4.30); Search for additional transfers that did not meet original threshold (.60); E-mails re: delivery of demand letters (.20); E-mails re: conference call (.20);	6.20	600.00	3,720.00
9/05/24	DND	E-mail correspondence with Chad V. Haes and Kathleen Frederick re: further amendments to letters re: potential fraudulent and preferential transfers; clarification on entities with various types of transfers and subsets of large entities, scheduling Telephone conference with Grobstein Teeple;	.50	360.00	180.00
9/05/24	DND	E-mail correspondence with Alina N. Mamlyuk and Andrew Still re: rescheduling telephone conference with re: complaint against Alteryx;	.10	360.00	36.00

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Date	Atty	Description	Hours	Rate	Amount
9/05/24	DND	Draft letters to recipients of potential preferential and fraudulent transfers;	4.20	360.00	1,512.00
9/05/24	DND	Review e-mail correspondence between Chad V. Haes and Grobstein Teeple re: scheduling call to go over list prepared re: recipients of potential fraudulent and preferential transfers;	.10	360.00	36.00
9/06/24	CVH	Review selection of letters drafted by Devan de los Reyes and e-mails re: same (.40); Draft and revise 23 demand letters (2.0); Search for additional transfers that did not meet original threshold (.40); E-mails re: delivery of demand letters (.10);	2.90	600.00	1,740.00
9/06/24	DND	E-mail correspondence with Chad V. Haes re: review of drafted letters;	.10	360.00	36.00
9/09/24	CVH	Review previous correspondence to locate PDFs from Grobstein Teeple (.20); Compare and contrast information contained on PDFs re: avoidable transfers with corresponding information located on spreadsheet and make notes of all discrepancies (1.20); E-mails with Dimple Mehra and Nick Cooper re: same (.30); E-mails with Kathleen Frederick and operator re: status of letters (.20);	1.90	600.00	1,140.00
9/09/24	DND	Review e-mail correspondence from Chad V. Haes to Grobstein Teeple re: lists of transfers, discrepancies, revisions; review of attached relevant pdfs and excel sheets;	.40	360.00	144.00
9/09/24	DND	Review internal e-mail correspondence from Chad V. Haes re: confirming mailing letters to potential fraudulent and preferential transfer recipients;	.10	360.00	36.00
9/10/24	CVH	E-mails with Kathleen Frederick re: calendaring issues (.10); Review new target charts form Nick Cooper and e-mails re: same (.50);	.60	600.00	360.00
9/10/24	DND	Review e-mail correspondence from Nick Cooper re: updated analyses for potentially fraudulent and preferential transfers;	.10	360.00	36.00
9/10/24	DND	Review e-mail correspondence between Reid Winthrop and Chad V. Haes re: discussing transfers to Master Builders of America;	.10	360.00	36.00
9/10/24	DND	Review e-mail correspondence between Chad V. Haes and Kathleen Frederick re: calendaring deadlines for letters to transfer recipients that are sent out;	.20	360.00	72.00
9/11/24	CVH	Revise spreadsheet to reflect latest transaction information from Grobstein Teeple (1.40); E-mails with Aaron E. de Leest re: conference call to discuss case (.10); E-mails with accounting and Kathleen Frederick re: telephone calls in response to demand letters (.20); E-mails with Kathleen Frederick and Devan de los Reyes re: drafting letters and updating spreadsheet (.20);	1.90	600.00	1,140.00

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Date	Atty	Description	Hours	Rate	Amount
9/12/24	CVH	Conference call with Aaron E. de Leest re: avoidance actions and next steps (1.50); Review and analyze briefing and case law related to avoidance claims against credit card companies and e-mails with Aaron E. de Leest re: same (.80);	2.30	600.00	1,380.00
9/12/24	DND	E-mail correspondence with Chad V. Haes re: pause on drafting letters to verify spreadsheet information;	.10	360.00	36.00
9/12/24	DND	Review e-mail correspondence between Chad V. Haes and Grobestein Teeple re: breakdown and evidence of transfers to Derrick Landry;	.10	360.00	36.00
9/12/24	DND	Review e-mail correspondence between Reid Winthrop and Chad V. Haes re: Vulcan lease as reason for funds transferred to Master Builders of America (.10); Review of attached invoices (.10); Review e-mail correspondence between Chad V. Haes and Yosina Lissebeck re: source of funds for transfer to Master Builders of America (.10);	.30	360.00	108.00
9/12/24	DND	Review e-mail correspondence between Chad V. Haes and Derrick Landry re: receipt of letter and questions re: what transfers;	.10	360.00	36.00
9/12/24	AEd	Telephone conference with Chad V. Haes re: avoidance power claims analysis and strategy, status of pending demand letters, and pursuit of claims;	1.50	610.00	915.00
9/12/24	AEd	Review updated list of 4 year, 1 year, and post petition transfers and written correspondence from Chad V. Haes re: same;	.30	610.00	183.00
9/12/24	AEd	Draft written correspondence to Chad V. Haes re: credit card claims and review written response;	.20	610.00	122.00
9/13/24	CVH	E-mails with Kathleen Frederick re: status of obtaining final addresses (.10); E-mails with Yosina Lissebeck, Christopher Celentino, and Tyler Powell re: updated lists of transfers (.20); E-mails with Nick Cooper and Dimple Mehra re: procedures for payment breakdowns moving forward (.30);	.60	600.00	360.00
9/13/24	DND	Review e-mail correspondence from Grobestein Teeple re: gathering support for transfers to Finlays;	.10	360.00	36.00
9/13/24	DND	Review e-mail correspondence from Chad V. Haes to Reid Winthrop re: claims bar date passed;	.10	360.00	36.00
9/13/24	AEd	Review written correspondence from Chad V. Haes re: avoidance power claim demand letters, responses, and requests for additional documents;	.20	610.00	122.00
9/13/24	AEd	Review written correspondence from Chad V. Haes, Nick Cooper, and Dimple Mehra re: target transferee supporting documents and tracing analysis (multiple);	.50	610.00	305.00
9/16/24	CVH	E-mails with Yosina Lissebeck and Christopher Celentino re: team meeting to discuss steps moving forward (.20);	.20	600.00	120.00

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Date	Atty	Description	Hours	Rate	Amount
9/16/24	DND	E-mail correspondence from Chad V. Haes and Dinsmore re: availability for meeting on 9/26 re: avoidance actions;	.20	360.00	72.00
9/16/24	AEd	Review written correspondence from Chad V. Haes and Christopher Celentino re: adversary proceedings and arguments;	.20	610.00	122.00
9/17/24	CVH	Revise spreadsheet to reflect latest transaction information from Grobstein Teeple (2.60);	2.60	600.00	1,560.00
9/17/24	DND	Review e-mail correspondence from Grobstein Teeple re: analysis and details for transfers to Finlays and Derrick Landry (.10); Review of analyses for Derrick Landry (.10); Finlays (.10), Master Builders of America (.10);	.40	360.00	144.00
9/18/24	CVH	Compare and contrast PDF lists from Grobstein Teeple to confirm all transfers listed on spreadsheet (1.30); E-mails with Nick Cooper re: requests for documents (.10);	1.40	600.00	840.00
9/18/24	DND	Review e-mail correspondence from Chad V. Haes to Reid Winthrop re: position on what value LPG received on account of transfers;	.10	360.00	36.00
9/18/24	AEd	Review written correspondence from Chad V. Haes re: demand letters and documents;	.10	610.00	61.00
9/19/24	CVH	E-mails with Kathleen Frederick, Sandee Pineda, and Devan de los Reyes re: follow up items and status of missing addresses for demand letters (.40); E-mails with LPG team re: updated excel spreadsheets and delivery of demand letters (.40); Compare and contrast PDF lists from Grobstein Teeple to confirm all transfers listed on spreadsheet (2.30); E-mail updated spreadsheet with explanation as to several new categories (.20);	3.30	600.00	1,980.00
9/19/24	DND	Review e-mail correspondence from Kathleen Frederick to Sandee Pineda re: searching for contact information for transfers that may be avoidable;	.20	360.00	72.00
9/19/24	DND	Review e-mail correspondence from Chad V. Haes to Kathleen Frederick re: updating spreadsheet to send avoidance letters and identifying mailing addresses for same letters;	.20	360.00	72.00
9/19/24	DND	E-mail correspondence with Chad V. Haes and Kathleen Frederick re: finalizing changes to spreadsheets prior to sending more avoidance letters, procedure for sending corrected transfer amounts;	.50	360.00	180.00
9/19/24	AEd	Review multiple written correspondence from Chad V. Haes re: demand letters and updated information and documents;	.50	610.00	305.00
9/19/24	AEd	Review written correspondence from Kathleen Frederick re: demand letters;	.10	610.00	61.00
9/19/24	SMP	Research for contact information on targets for avoidance actions;	1.00	340.00	340.00

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Date	Atty	Description	Hours	Rate	Amount
9/20/24	CVH	E-mails and telephone call with Aaron E. de Leest re: status of avoidance actions (.50);	.50	600.00	300.00
9/20/24	AEd	Telephone conference with Chad V. Haes re: status of demand letters and preparing for avoidance power actions;	.40	610.00	244.00
9/20/24	AEd	Review written correspondence from Josh Teeple, Christopher Celentino and Richard A. Marshack re: avoidance power claims and meeting re: same and draft written responses;	.30	610.00	183.00
9/20/24	SMP	Research for contact information on targets for avoidance actions;	.50	340.00	170.00
9/23/24	CVH	Draft and revise demand letters (1.30);	1.30	600.00	780.00
9/23/24	ANM	Drafted and sent e-mail to avoidance actions team re: a possible landlord contract;	.10	500.00	50.00
9/23/24	DND	Review e-mail correspondence from Chad V. Haes to Reid Winthrop re: Tony Diab signature as principal for Vulcan, not LPG, link to submit late filed proof of claim;	.10	360.00	36.00
9/23/24	AEd	Review Chad V. Haes avoidance power claims analysis and chart re: same and review Grobstein Teeple fraudulent transfer, preference, and post petition transfer analysis;	.70	610.00	427.00
Sub-Total Fees:			61.50		\$ 31,585.00

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Date	Atty	Description	Hours	Rate	Amount
8/01/24	CVH	E-mail to Ryan Pinkston re: document production (.10);	.10	600.00	60.00
8/08/24	CVH	E-mails with Ryan Pinkston re: status of document production (.10);	.10	600.00	60.00
8/26/24	CVH	E-mails with Ryan Pinkston re: status of production and of execution of documents (.20);	.20	600.00	120.00
8/29/24	CVH	Review document production and custodian of records declaration (.80); Compare production with document requests (.20); E-mails with Ryan Pinkston and Yosina Lissebeck re: same (.20);	1.20	600.00	720.00
8/30/24	CVH	E-mails with Ryan Pinkston re: telephone call (.20);	.20	600.00	120.00
9/03/24	CVH	Prepare for call with Ryan Pinkston (.20); Conference call with Ryan Pinkston (.20);	.40	600.00	240.00
9/05/24	CVH	E-mails with Ryan Pinkston re: conference call (.10);	.10	600.00	60.00

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Date	Atty	Description	Hours	Rate	Amount
9/06/24	CVH	E-mails with Ryan Pinkston re: conference call (.10);	.10	600.00	60.00
9/09/24	CVH	E-mails with Ryan Pinkston to schedule conference call (.10);	.10	600.00	60.00
9/10/24	CVH	Review documents and correspondence to prepare for call with Ryan Pinkston and in-house counsel (.30); Attend conference call (.70);	1.00	600.00	600.00
9/11/24	CVH	Multiple lengthy e-mails with Ryan Pinkston, Yosina Lissebeck, and Tyler Powell re: production from Bill.com (.80);	.80	600.00	480.00
9/12/24	DND	Review e-mail correspondence between Chad V. Haes and Ryan Pinkston re: Bill.com document request to investigate third parties, explanation of "payment status" language;	.20	360.00	72.00
9/13/24	CVH	E-mails with Tyler Powell re: information requested from Bill.com (.10);	.10	600.00	60.00
9/17/24	DND	Review e-mail correspondence from Ryan Pinkston re: Bill.com payments and recipients excel sheet, meaning of terms; potentially for use with fraudulent and preferential transfers;	.20	360.00	72.00
9/18/24	CVH	Review and analyze spreadsheet from counsel for Bill.com (.30); E-mails with Ryan Pinkston, Yosina Lissebeck, and Tyler Powell re: same (.40);	.70	600.00	420.00
9/18/24	DND	Review e-mail correspondence between Chad V. Haes and Ryan Pinkston (x3) re: contents of spreadsheet from Bill.com, meaning of phrases such as "processed," "other, etc., time and expense to produce additional documents, investigation of Daniel March;	.30	360.00	108.00
9/18/24	DND	Review e-mail correspondence from Chad V. Haes to Dinsmore re: spreadsheet from Bill.com re: transfers to third parties;	.10	360.00	36.00
9/23/24	CVH	E-mails with Ryan Pinkston and paralegals re: additional document production (.20); E-mails with Ryan Pinkston, Pam Kraus, Yosina Lissebeck, and Aaron E. de Leest re: turnover of funds (.20); E-mails with Ryan Pinkston and Deborah Danilof re: additional searches for documents and estimates for that work (.30);	.70	600.00	420.00
9/23/24	DND	Review e-mail correspondence between Chad V. Haes and Ryan Pinkston re: Bill.com definitions, time required to process additional work to pull checks, compile records, etc. to track third party payments (.20); Review e-mail correspondence re: amount of funds Bill.com is holding (.10);	.30	360.00	108.00
9/23/24	DND	Review e-mail correspondence between Chad V. Haes and Dinsmore re: definitions from Bill.com and time to conduct work to track transfers to third parties;	.10	360.00	36.00
9/23/24	DND	Review e-mail correspondence from Chad V. Haes to Pam Kraus re: handling turnover of funds (.10); E-mail correspondence between Chad V. Haes, Yosina Lissebeck, Aaron E. de Leest re: Bill.com funds for turnover to Trustee (.20);	.30	360.00	108.00

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Date	Atty	Description	Hours	Rate	Amount
9/23/24	AEd	Review written correspondence from Chad V. Haes re: Bill.com transactions and funds held and draft written response;	.20	610.00	122.00
Sub-Total Fees:			7.50		\$ 4,142.00

15.10 EnergyCare LLC

Date	Atty	Description	Hours	Rate	Amount
9/23/24	CVH	Review and analyze response to demand letter and attached documents (.70); E-mails with Yosina Lissebeck and Aaron E. de Leest re: same (.40);	1.10	600.00	660.00
9/23/24	DND	Review e-mail correspondence between Chad V. Haes, Aaron E. de Leest re: information provided by Energycare LLC (dba ARG Group) as call center business, confirmation of information;	.20	360.00	72.00
9/23/24	AEd	Review written correspondence from Chad V. Haes re: Energycare LLC fraudulent transfer analysis and response to demand letter and draft written response;	.20	610.00	122.00
Sub-Total Fees:			1.50		\$ 854.00

15.11 Jaclyn Noe

Date	Atty	Description	Hours	Rate	Amount
9/17/24	CVH	Telephone call with Jackelyn Moreh re: demand letter (.70); E-mails with operator re: same (.10);	.80	600.00	480.00
Sub-Total Fees:			.80		\$ 480.00

15.2 White collar

Date	Atty	Description	Hours	Rate	Amount
8/01/24	CVH	E-mail to Brent Phillips re: response to demand letter (.10);	.10	600.00	60.00

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Date	Atty	Description	Hours	Rate	Amount
8/05/24	CVH	E-mails with Brent Phillips re: status of response (.10);	.10	600.00	60.00
8/26/24	CVH	E-mails with Brent Phillips re: status of response to demand letter (.10);	.10	600.00	60.00
Sub-Total Fees:			.30		\$ 180.00

15.4 Paronich Law Firm

Date	Atty	Description	Hours	Rate	Amount
8/15/24	CVH	E-mails with Andrew Perrong re: counter-offer (.20);	.20	600.00	120.00
8/19/24	DEH	Written correspondence with Chad V. Haes re: Paronich alleged defense to preference;	.30	740.00	222.00
8/19/24	CVH	E-mails with Andrew Parrong and the Trustee re: settlement counter-offer (.30); E-mail from D. Edward Hays re: same (.10);	.40	600.00	240.00
9/02/24	CVH	E-mails with Trustee and D. Edward Hays re: claim status (.20);	.20	600.00	120.00
9/03/24	CVH	E-mails with Trustee re: status of settlement (.20);	.20	600.00	120.00
Sub-Total Fees:			1.30		\$ 822.00

15.5 Master Builders of America

Date	Atty	Description	Hours	Rate	Amount
9/10/24	CVH	E-mails with Reid Winthrop re: demand letter (.20);	.20	600.00	120.00
9/11/24	CVH	Prepare for telephone call with counsel for transferee (.20); Conference call and e-mails with Reid Winthrop (.30); Review and analyze invoices and lease agreement from Reid Winthrop (.40); E-mails with Tyler Powell and Yosina Lissebeck re: same (.20);	1.10	600.00	660.00
9/13/24	CVH	E-mails with Reid Winthrop, Yosina Lissebeck, and Dimple Mehra re: source of payments and breakdown (.30); E-mails with Reid Winthrop and Yosina Lissebeck re: claims bar date (.10); Review bank documents and accountings from Nick Cooper and e-mails re: same (.30); E-mails with Tyler Powell and Yosina Lissebeck re: transfers (.20);	.90	600.00	540.00

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Date	Atty	Description	Hours	Rate	Amount
9/18/24	CVH	Review and analyze documents from Nick Cooper establishing payments from debtor's account (.20); Label and categorize documents received from Nick Cooper and from Reid Winthrop (.20); E-mails with Reid Winthrop re: potential claims against American Builders (.20);	.60	600.00	360.00
9/19/24	DND	Review e-mail correspondence from Reid Winthrop re: response of Master Builders re: belief that Vulcan is LPG and was operating out of space and review of attached emails and documentation;	.30	360.00	108.00
9/23/24	CVH	Review and analyze additional documents and information from Reid Winthrop re: lease assignment and the alleged provision to REV to the debtor (.30); Review schedules and SOFA to further assess opposing counsel's REV argument (.30); E-mails with Reid Winthrop, Yosina Lissebeck, Tyler Powell, Christopher Ghio, Christopher Celentino, and Alina N. Mamlyuk re: same (.60); Investigate leased space online (.10);	1.30	600.00	780.00
9/23/24	DND	Review e-mail correspondence between Chad V. Haes, Alina N. Mamlyuk, D. Edward Hays, Lori Bicher and Dinsmore (x10) re: recognition of address LPG allegedly operated out of Santa Ana leased from Master Builders;	.40	360.00	144.00
9/23/24	DND	E-mail correspondence with Chad V. Haes and Kathleen Frederick re: storing information related to Golden Circle;	.20	360.00	72.00
Sub-Total Fees:			5.00		\$ 2,784.00

15.6 Kindlund Legal LLC

Date	Atty	Description	Hours	Rate	Amount
9/16/24	CVH	E-mails with Jillian Kindlund, and Kathleen Frederick re: demand letter (.20);	.20	600.00	120.00
9/16/24	DND	Review e-mail correspondence between Jillian Kindlund and Chad V. Haes re: receipt of letter re: fraudulent and preferential transfers;	.10	360.00	36.00
9/23/24	CVH	E-mails with Jillian Kindlund, Nick Cooper, and Dimple Mehra re: demand letter (.20);	.20	600.00	120.00
9/23/24	DND	Review e-mail correspondence between Chad V. Haes and Jillian Kindlund re: request for list of transfers (.10); Review e-mail correspondence between Chad V. Haes and Grobestein Teeple re: same list of transfers (.10);	.20	360.00	72.00
Sub-Total Fees:			.70		\$ 348.00

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15.7 Finlays HR

Date	Atty	Description	Hours	Rate	Amount
9/11/24	CVH	Telephone call with Sameena Naqvi re: demand letter (.40); E-mails with Nick Cooper and Dimple Mehra re: information requested (.10);	.50	600.00	300.00
9/18/24	CVH	Review and analyze documents from Nick Cooper establishing payments from debtor's account (.20); Label and categorize documents received from Nick Cooper (.20); E-mails with Sameena Naqvi re: potential claims against Finlays (.10);	.50	600.00	300.00
9/18/24	DND	Review e-mail correspondence from Chad V. Haes to Sameena re: documents evidencing transfers to Finlays;	.10	360.00	36.00
Sub-Total Fees:			1.10		\$ 636.00

15.8 Derrick Landry

Date	Atty	Description	Hours	Rate	Amount
9/11/24	CVH	E-mails with Derrick Landry re: demand letter (.10); E-mails with Nick Cooper and Dimple Mehra re: information requested (.20);	.30	600.00	180.00
9/18/24	CVH	Review and analyze documents from Nick Cooper establishing payments from debtor's account (.20); Label and categorize documents received from Nick Cooper (.20); E-mails with Derrick Landry re: potential claims (.10);	.50	600.00	300.00
9/18/24	DND	Review e-mail correspondence from Chad V. Haes to Derrick Landry re: documents evidencing transfers to him;	.10	360.00	36.00
Sub-Total Fees:			.90		\$ 516.00

15.9 Oppenheim Group

Date	Atty	Description	Hours	Rate	Amount
9/20/24	CVH	E-mails with Alexandre Cornelius re: demand letter (.20); E-mails with Nick Cooper and Dimple Mehra re: payment details (.10);	.30	600.00	180.00

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Date	Atty	Description	Hours	Rate	Amount
9/20/24	DND	Review e-mail correspondence between Alex Cornelius and Chad V. Haes re: transfers to Jason Oppenheim/Openheim Group likely for rent, gathering records;	.10	360.00	36.00
9/20/24	DND	Review e-mail correspondence from Chad V. Haes to Grobestein Teeple re: request for payment details for Oppenheim;	.10	360.00	36.00
9/23/24	CVH	Review schedules and SOFA to further assess opposing counsel's REV argument (.30);	.30	600.00	180.00
Sub-Total Fees:			.80		\$ 432.00

16 Administrative Claims

Date	Atty	Description	Hours	Rate	Amount
8/01/24	DND	Review e-mail correspondence from Jennifer McLaughlin re: revisions to administrative claim stipulation and signature;	.10	360.00	36.00
8/01/24	DND	Revise stipulation with Jennifer McLaughlin; E-mail correspondence with Layla Buchanan re: same;	.20	360.00	72.00
8/01/24	DND	E-mail correspondence from Layla Buchanan to Jennifer McLaughlin re: word version of stipulation for review and signature;	.10	360.00	36.00
8/02/24	DND	E-mail correspondence from Jennifer McLaughlin re: redlined administrative claim stipulation, review of redline;	.10	360.00	36.00
8/06/24	ANM	Prepared a chart of pre-petition and post-petition transfers made from Debtor's bank accounts to admin claimant Alteryx and drafted/sent e-mail correspondence to Alteryx' counsel with the list of transfers;	.30	500.00	150.00
8/07/24	ANM	Reviewed the objection to plan confirmation filed by counsel K March for admin claims 674, 675, 676 to confirm that information about Trustee's responses to those claims is accurate;	.20	500.00	100.00
8/08/24	ANM	Telephone conference with D. Edward Hays reviewing the prepared complaint against administrative claimant Alteryx;	.60	500.00	300.00
8/09/24	ANM	Reviewing edits of D. Edward Hays to the complaint against administrative claimant Alteryx;	.30	500.00	150.00
8/09/24	ANM	Drafted and sent e-mail correspondence to Yosina Lissebeck re: copy of amended Marshack v Diab complaint so Marshack Hays Wood has correct facts for opposition and litigation against administrative claimant Alteryx;	.10	500.00	50.00

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Date	Atty	Description	Hours	Rate	Amount
8/12/24	DND	Review e-mail correspondence from Jennifer McLaughlin re: administrative expense claim edits;	.10	360.00	36.00
8/13/24	ANM	Reviewed the latest draft of amended complaint to assure that complaint against administrative claimant Alteryx does not contain any factual allegation errors;	.60	500.00	300.00
8/14/24	ANM	Drafted and sent e-mail correspondence to Yosina Lissebeck re: total amount of administrative claims that have to be paid on effective date of plan confirmation;	.10	500.00	50.00
8/18/24	ANM	Drafted and sent e-mail correspondence to Jeremy Freedman of Dinsmore with contact infor for administrative claimant Melina Beltran;	.10	500.00	50.00
8/20/24	DND	Review e-mail correspondence from David Goodrich re: Morning Law Group needing extra time to respond to subpoena re: post-petition customers;	.10	360.00	36.00
8/21/24	ANM	Reviewed stipulation with administrative claimant Jennifer McLaughlin and made changes before sending e-mail correspondence to Layla Buchanan to finalize and file;	.40	500.00	200.00
8/21/24	ANM	Drafted and sent e-mail correspondence to administrative claimant Jorge Sanchez re: timelines of payments tied to effective date of the plan and explaining said effective date;	.20	500.00	100.00
8/21/24	ANM	Revising complaint against administrative claimant Alteryx per notes given by D. Edward Hays before sending Alteryx's counsel;	.20	500.00	100.00
8/21/24	ANM	Drafted and sent e-mail correspondence to Melissa Wilkes about the timeline of the administrative claim payments;	.10	500.00	50.00
8/21/24	DND	Review e-mail correspondence from Jennifer McLaughlin and D. Edward Hays re: signature for administrative claim;	.20	360.00	72.00
8/21/24	DND	Review e-mail correspondence from Alina N. Mamlyuk re: Jennifer McLaughlin claim for signature;	.10	360.00	36.00
8/22/24	ANM	Drafted and sent e-mail correspondence to administrative claimant Melissa Wilkes answering a string of four e-mails from her re: her perceived difference in her allowable clam versus allowable claims of other local counsel; Verified notes and e-mails and other administrative claims motions (Wilkes, Marble and Hurst, Randall Baldwin Clark and Peter Schneider) to draft the detailed response;	1.10	500.00	550.00
8/22/24	ANM	Drafted and sent e-mail correspondence to administrative claimant Melissa Wilkes re: possible miscalculation of allowable claim and asking her to forward any documentation substantiating discrepancy she is pointing out;	.10	500.00	50.00
8/22/24	DND	Review e-mail correspondence between Melissa Wilkes and Alina N. Mamlyuk re: status of Wilkes administrative expense claim;	.50	360.00	180.00

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Date	Atty	Description	Hours	Rate	Amount
8/23/24	ANM	Drafting the revised version of complaint against administrative claimant Alteryx and incorporating changes and revisions made by D. Edward Hays;	2.30	500.00	1,150.00
8/23/24	ANM	Drafted and sent e-mail correspondence to D. Edward Hays and to Jeremy Freedman and Yosina Lissebeck at Dinsmore soliciting further revisions on complaint against administrative claimant Alteryx;	.30	500.00	150.00
8/23/24	ANM	Drafted and sent e-mail correspondence to David Goodrich, counsel for administrative claimant United Partnerships re: status of evidence that was subpoenaed by him to meet burden of proof;	.10	500.00	50.00
8/23/24	ANM	Drafted and sent e-mail correspondence to Eric Gassman, counsel for administrative claimant Herret re: evidence to meet Herret's burden of proof;	.20	500.00	100.00
8/23/24	ANM	Drafted and sent e-mail correspondence to Dismore re: possible adversary complaint against Herret and strategy for filing;	.10	500.00	50.00
8/23/24	ANM	Telephone conference with D. Edward Hays re: draft of complaint against administrative claimant Alteryx;	.20	500.00	100.00
8/23/24	ANM	Drafted and sent e-mail correspondence to David Goodrich, counsel for administrative claimant United Partnerships (UP) re: his suggestions to continue hearing on UP's motion;	.10	500.00	50.00
8/23/24	ANM	Telephone conference with Yosina Lissebeck (Trustee's special counsel at Dinsmore) re: draft complaint to forward to administrative claimant Alteryx;	.10	500.00	50.00
8/23/24	ANM	Reviewing communication with David Goodrich, counsel for administrative claimant United Partnerships (UP) and drafting additional recitals for stipulation to continue hearing on UP's motion;	.40	500.00	200.00
8/23/24	ANM	Drafted and sent e-mail to Eric Gassman, counsel for administrative claimant Herret, re: setting up a call to review possible additional evidence or, alternatively, continuing the hearing;	.10	500.00	50.00
8/23/24	ANM	Revising specific sections of adversary complaint against administrative claimant Alteryx per instructions by D. Edward Hays and Yosina Lissebeck;	.70	500.00	350.00
8/23/24	ANM	Finalized drafting edits on adversary complaint against administrative claimant Alteryx and forwarded a draft copy to Alteryx's counsel for review;	.20	500.00	100.00
8/23/24	ANM	Drafted a stipulation for administrative claimant United Partnership and e-mailed a copy to Layla Buchanan for signatures and filing;	.40	500.00	200.00
8/23/24	ANM	Telephone conference with Eric Gassman, counsel for administrative claimant Herret re: burden of proof, evidence and stipulation to continue hearing to October 23, 2024;	.40	500.00	200.00

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Date	Atty	Description	Hours	Rate	Amount
8/23/24	ANM	Drafted and sent e-mail correspondence to Layla Buchanan re: word doc file for stipulation to continue hearing for administrative claimant Herret;	.10	500.00	50.00
8/23/24	ANM	Edited an order for lodging approving stipulation with administrative claimant Jennifer MacLaughlin;	.10	500.00	50.00
8/23/24	ANM	Drafted stipulation to continue the hearing on motion for administrative claimant Herret Credit Consultants to include facts that happened since last stipulation and sent to Layla Buchanan for signing of parties and filing;	.30	500.00	150.00
8/23/24	DND	Review e-mail correspondence from Alina N. Mamlyuk to Eric Gassman re: sending evidence for Herret, status report, stipulation to continue to October;	.30	360.00	108.00
8/23/24	DND	Review e-mail correspondence between Alina N. Mamlyuk, Christopher Celentino, Yosina Lissebeck re: filing adversary complaint against Herret Credit Consultants and Kyle Herret and interplay with administrative expense claim;	.40	360.00	144.00
8/23/24	DND	Review e-mail correspondence between Alina N. Mamlyuk, D. Edward Hays, David Goodrich re: status of evidence for United Partnerships administrative expense claim, communications with Morning Law (.40); E-mail correspondence between Yosina Lissebeck, Christopher Ghio re: same and pushing dates (.20);	.60	360.00	216.00
8/23/24	DND	Review stipulation to modify briefing with United Partnerships;	.10	360.00	36.00
8/26/24	ANM	Two telephone conferences with Yosina Lissebeck at Dinsmore re: administrative claim chart totals need for disclosures and any possible mistakes in calculation;	.40	500.00	200.00
8/26/24	ANM	Called the Marshack Hays Wood office to inform about upcoming call with Andrew Still, counsel for admin claimant Alteryx to make sure it's put through without messages (.10); Drafted and sent e-mail correspondence to Layla Buchanan re: filing of stipulations with admin claimants United Partnerships and Herret Credit Consultants (.10);	.20	500.00	100.00
8/26/24	ANM	Reviewing and revising up-to-date draft of Trustee's response to Alteryx's administrative claim (.70); Telephone conference with Andrew Still, counsel of Alteryx, re: draft of complaint that Alteryx received for review and schedule of upcoming calls about settlement (.50);	1.20	500.00	600.00
8/26/24	ANM	Drafted and sent e-mail correspondence to Andrew Still re: summary of phone cal and Trustee' confirmation of not filing complaint against administrative claimant Alteryx until September 10;	.20	500.00	100.00

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Date	Atty	Description	Hours	Rate	Amount
8/26/24	ANM	Telephone conference with the Trustee re: administrative claimant Alteryx and deadlines for filing of complaint and settlement negotiations;	.20	500.00	100.00
8/26/24	ANM	Drafted and sent e-mail correspondence to Yosina Lissebeck and D. Edward Hays re: summary of call with admin claimant Alteryx and upcoming strategy for settlement discussions;	.30	500.00	150.00
8/26/24	ANM	Drafted and sent e-mail correspondence to Yosina Lissebeck with latest calculation for administrative claimant Alteryx;	.20	500.00	100.00
8/26/24	ANM	Telephone conference with Yosina Lissebeck re: administrative claimant Alteryx and any possible additional information that is needed for plan confirmation hearing;	.20	500.00	100.00
8/26/24	ANM	Drafted and sent e-mail correspondence to administrative claimant Jennifer McLaughlin with a courtesy copy of the order allowing a stipulated upon amount of her claim and providing information re: plan confirmation hearing;	.10	500.00	50.00
8/26/24	ANM	Reviewed and approved orders for lodging for stipulations with administrative claimants Herret and United Partnerships and stipulation to continue with administrative claimant Alteryx;	.10	500.00	50.00
8/26/24	DND	Review e-mail correspondence from David Goodrich re: executed stipulation to modify briefing schedule re: United Partnerships;	.10	360.00	36.00
8/26/24	DND	Review e-mail correspondence from Alina N. Mamlyuk to Jennifer McLaughlin re: court's order approving settlement;	.10	360.00	36.00
8/27/24	DEH	Telephone conference with Laila Masud re: EPD case authority and Ponzi scheme presumption adjudicated in orders denying administrative claims sought by Greyson and Trinh;	.10	740.00	74.00
8/27/24	LM	Telephone conference with D. Edward Hays re: EPD case authority and ponzi scheme presumption in admin claims denial of Trihns;	.10	540.00	54.00
8/27/24	BNB	Review entered order denying Greyson Law motion for administrative claim;	.10	410.00	41.00
8/27/24	ANM	Read the decisions in administrative claims for Han Trinh, Jayde Trinh and Greyson Law in preparation of using court's 60+ pg decision to be an executive summary of findings of facts moving forward in other administrative claims and adversaries;	1.50	500.00	750.00
8/27/24	DND	Telephone conferences with Alina N. Mamlyuk re: decision on administrative claims of Greyson Law, moving forward on avoidance actions, schedule for discussions with Alteryx;	.30	360.00	108.00
8/27/24	DND	Review and analyze decision denying Greyson Law administrative expense claim;	1.20	360.00	432.00

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8/27/24	DND	Review and analyze decision on administrative expense claim of Jayde Trinh;	.40	360.00	144.00
8/27/24	DND	Review internal e-mail correspondence re: decision on administrative expense claim of Greyson;	.20	360.00	72.00
8/27/24	DND	Review and analyze decision re: administrative expense claim of Han Trinh;	.30	360.00	108.00
8/29/24	DND	Review e-mail correspondence from Melina Beltran re: status of confirmation hearing and when she'll hear from Trustee's administrator for payment of her administrative expense claim;	.10	360.00	36.00
8/30/24	ANM	Drafted and sent e-mail correspondence to Glenn Moses, counsel for admin claimant ADP, re: effective date of the plan which is when allowed admin claims will be paid;	.10	500.00	50.00
8/30/24	ANM	Drafted and sent e-mail correspondence to D. Edward Hays and Yosina Lissebeck re: exact effective date that I can start responding with to administrative claimants;	.10	500.00	50.00
8/30/24	ANM	Drafted and sent e-mail correspondence to administrative claimant Peter Schneider re: effective date of the plan and timeline of payment of allowed administrative claims;	.10	500.00	50.00
8/30/24	ANM	Telephone conference with Aaron E. de Leest re: new assignment of omnibus objection to all of the incorrectly filed administrative claims in this case;	1.10	500.00	550.00
8/30/24	ANM	Telephone conference with Aaron E. de Leest re: specific incorrectly designated administrative claimants who will be subject to objection;	.30	500.00	150.00
9/05/24	DND	Review e-mail correspondence from Melissa Wilkes to Alina N. Mamlyuk re: review of invoices;	.10	360.00	36.00
9/06/24	ANM	Drafted and sent e-mail correspondence to admin claimant Melina Beltran re: Effective Date of plan confirmation;	.10	500.00	50.00
9/06/24	ANM	A series of drafted and sent e-mail correspondences with Andrew Still, counsel for admin claimant Alteryx, to finalize time for telephone conference re: settlement and outlining Trustee's ask;	.20	500.00	100.00
9/06/24	ANM	Drafted and sent e-mail correspondence to Richard A. Marshack and his counsel team re: settlement offer of admin claimant Alteryx;	.20	500.00	100.00
9/06/24	ANM	Drafted and sent e-mail to admin claimant Alteryx's counsel re: Trustee's timeline on response to settlement offer (.10); Telephone conference with same counsel re: next steps in settlement discussions (.10);	.20	500.00	100.00
9/06/24	DND	Review of e-mail correspondence between Alina N. Mamlyuk and Melina Beltran re: results of confirmation hearing, when she will hear from Pam Kraus re: claim;	.10	360.00	36.00

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Date	Atty	Description	Hours	Rate	Amount
9/07/24	ANM	Drafted a memo for a meeting with the Trustee re: settlement offer by admin claimant Alteryx; Drafted and sent e-mail correspondence to the Trustee and D. Edward Hays re: Telephone conference on Monday, 9/9 to decide on settlement with Alteryx;	.90	500.00	450.00
9/09/24	DEH	Telephone conference with Andrew Snell and Alina N. Mamlyuk re: issues raised in draft complaint against Alteryx and settlement negotiations;	.70	740.00	518.00
9/09/24	ANM	Telephone conference with the Trustee and D. Edward Hays re: strategy for settlement for Alteryx administrative claim;	.90	500.00	450.00
9/09/24	ANM	Telephone conference with Andrew Snell, counsel for administrative claimant Alteryx (dk. no 750) re: issues raised in draft complaint against Alteryx and settlement negotiations;	.70	500.00	350.00
9/11/24	DND	Telephone conference with Alina N. Mamlyuk re: appeal of Greyson, Han Trinh, Jayde Trinh decisions;	.30	360.00	108.00
9/12/24	ANM	Drafted and sent e-mail correspondence to Laila Masud re: billing codes and procedure for appeals for three administrative claims (Han Trinh, Jayde Trinh and Greyson);	.10	500.00	50.00
9/12/24	ANM	Drafted and sent e-mail correspondence to Layla Buchanan re: notices of elections for three appeals of administrative claims (Han Trinh, Jayde Trinh, Greyson);	.10	500.00	50.00
9/12/24	ANM	Drafted and sent e-mail correspondence to accounting to create separate appellate codes according to instructions by Laila Masud for upcoming appeals of administrative claims Han Trinh, Jayde Trinh and Greyson;	.10	500.00	50.00
9/18/24	ANM	Drafted and sent e-mail correspondence to Andrew Still, counsel for admin claimant Alteryx re: extension of time for the Trustee to file an adversary;	.10	500.00	50.00
9/20/24	ANM	Verifying proof of claim forms against Court's orders for allowed administrative claims (.10); Drafted and sent e-mail correspondence to admin claimant Peter Schneider re: effective date of Ch 11 Plan and timeline of payment for administrative claims (.10);	.20	500.00	100.00
9/20/24	ANM	Drafted and sent e-mail correspondence to admin claimant Melissa Wilkes re: calculation of amount in the stipulation between her and the Trustee;	.20	500.00	100.00
9/20/24	ANM	Telephone conference with Aaron E. de Leest re: Trustee's Objection to Improperly Designated Administrative Claims;	.60	500.00	300.00
9/23/24	ANM	Drafted and sent e-mail correspondence to Pam Kraus and Aaron E. de Leest re: exact date allowed admin claim checks will be sent out so I can respond to admin claimant inquiries;	.10	500.00	50.00

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Date	Atty	Description	Hours	Rate	Amount
9/23/24	ANM	Drafted and sent e-mail correspondence to admin claimant Melina Beltran re: checks for allowed admin claims going out;	.10	500.00	50.00
9/23/24	ANM	Drafted and sent e-mail correspondence to counsel for admin claimant Randall Baldwin Clark re: timeline of payment of admin claims;	.10	500.00	50.00
9/23/24	ANM	Drafted and sent e-mail correspondence to admin claimant Kimberly Torress re: payment timeline;	.10	500.00	50.00
9/23/24	ANM	Drafted and sent e-mail correspondence re: change of address for admin claimant Melina Beltran for receipt of her payment;	.10	500.00	50.00
9/23/24	ANM	Telephone conference with Aaron E. de Leest re: 3 strategy and deadlines of appeals of administrative claims of Han Trinh, Jayde Trinh, and Greyson; Resolution of 3 remaining admin claims of Alteryx, Herret Credit Consultants and United Partnerships;	.40	500.00	200.00
9/23/24	DND	Review e-mail correspondence from Melina Beltran re: confirmation of claim and order entered, waiting on response (.10); Review of docket for confirmation order and review of same (.20);	.30	360.00	108.00
9/23/24	AEd	Review written correspondence from Alina Mamyluk re: allowed administrative claim payments and respond and review written response from Pam Kraus re: same;	.20	610.00	122.00
Sub-Total Fees:			29.90		\$ 14,263.00

17 Secured Claims

Date	Atty	Description	Hours	Rate	Amount
8/01/24	BNB	Review and revise order granting omnibus objection to secured claims;	.50	410.00	205.00
8/05/24	BNB	Telephone conference with D. Edward Hays re: proposed order on omnibus secured claim objection;	.10	410.00	41.00
8/05/24	BNB	Finish revising order granting omnibus claim objection;	.70	410.00	287.00
8/06/24	LM	Written correspondence with Yosina Lissebeck re: updated secured creditor chart (.10); Review and analyze same (.30);	.40	540.00	216.00
8/07/24	BNB	Written correspondence with D. Edward Hays re: review of order granting omnibus secured claim objection;	.10	410.00	41.00
8/08/24	LM	Written correspondence with Bradford N. Barnhardt re: secured creditor chart;	.10	540.00	54.00

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Date	Atty	Description	Hours	Rate	Amount
8/08/24	BNB	Review e-mail correspondence between Trustee's counsel and Daniel Connoley (journalist) re: forthcoming article, and search for updated secured creditor chart;	1.10	410.00	451.00
8/08/24	BNB	Written correspondence with D. Edward Hays re: review of order granting omnibus secured claim objection;	.10	410.00	41.00
8/09/24	BNB	Written correspondence with D. Edward Hays re: review of order granting omnibus secured claim objection, and with Cynthia Bastida and Chanel Mendoza re: lodging order;	.20	410.00	82.00
8/09/24	BNB	Draft order approving Azzure stipulation;	.90	410.00	369.00
8/16/24	LB	Review and finalize application for order shortening time re: motion to approve Azzure Cash Collateral Stipulation (.40); Review and finalize motion to approve same (.30); Review and finalize proposed order on order shortening time (.10);	.80	340.00	272.00
Sub-Total Fees:			5.00		\$ 2,059.00

3 Business Operations

Date	Atty	Description	Hours	Rate	Amount
8/16/24	LM	Telephone conference with Bradford N. Barnhardt re: cash collateral stipulation;	.10	540.00	54.00
8/16/24	LM	Review written correspondences from Bradford N. Barnhardt and D. Edward Hays re: motion to approve cash collateral stipulation with Azzure;	.20	540.00	108.00
8/16/24	BNB	Telephone conference with Laila Masud re: cash collateral stipulation;	.10	410.00	41.00
8/16/24	BNB	Telephone conference with Alina N. Mamlyuk re: drafting motion to approve Azzure cash collateral motion;	.10	410.00	41.00
8/16/24	BNB	Draft application for order setting hearing on shortened notice re: Azzure cash collateral motion;	.60	410.00	246.00
8/16/24	BNB	Written correspondence with D. Edward Hays re: review of Azzure order and Azzure stipulation, and draft and research re: motion to approve stipulation;	4.30	410.00	1,763.00
8/16/24	BNB	Final review of Azzure cash collateral filings;	.10	410.00	41.00
8/16/24	ANM	Telephone conference with Bradford N. Barnhardt re: drafting motion to approve Azzure cash collateral motion;	.10	500.00	50.00
8/17/24	BNB	Review and revise statement for cash collateral motion;	.10	410.00	41.00

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Date	Atty	Description	Hours	Rate	Amount
8/19/24	DEH	Telephone conference with bankruptcy court re: court's order shortening time re: Azzure motion to approve stipulation for use of cash collateral (.10); Telephone conference with Layla Buchanan re: requirements for telephonic and other notice (.10);	.20	740.00	148.00
8/19/24	DEH	Written correspondence with Sharon Weiss re: hearing on motion to approve stipulation with Azzure;	.20	740.00	148.00
8/19/24	BNB	Review and revise notice of Azzure cash collateral motion;	.20	410.00	82.00
8/19/24	BNB	Review order shortening time on Azzure cash collateral motion, and calendar dates and deadlines;	.20	410.00	82.00
8/19/24	BNB	Review and revise declaration of notice re: Azzure cash collateral motion;	.30	410.00	123.00
8/19/24	BNB	Telephone conference with Layla Buchanan re: notice of Azzure cash collateral motion (.10); Written correspondence with D. Edward Hays re: same (.10);	.20	410.00	82.00
8/26/24	BNB	Review docket for objections to cash collateral motion, and written correspondence with D. Edward Hays re: same;	.30	410.00	123.00
8/26/24	BNB	Written correspondence with D. Edward Hays and Laila Masud re: know your customer accounts at JPMorgan Chase;	.10	410.00	41.00
Sub-Total Fees:			7.40		\$ 3,214.00

4 Case Administration

Date	Atty	Description	Hours	Rate	Amount
8/02/24	DEH	Research re: standards for Chapter 11 Trustee compensation under Sections 330(a)(3) and (a)(7) (.50); Written correspondence with Nancy Rapoport, Richard A. Marshack, Christopher Celentino, and Yosina Lissebeck re: same (.30);	.80	740.00	592.00
8/02/24	DEH	Written correspondence with Christopher Celentino and Richard A. Marshack re: revisions to fee examiner stipulation;	.20	740.00	148.00
8/07/24	DEH	Telephone conference with Richard A. Marshack re: response to Daniel Connolly at Law360;	.20	740.00	148.00
8/07/24	DEH	Research pleadings to identify exhibits to send to Dan Connolly (.30); Written correspondence with Daniel Connolly re: plan, overwhelming support of creditors, and Trustee's position on confirmation (.50);	.80	740.00	592.00
8/08/24	CVH	Review Law360 article re: case status (.20) (No Charge);	.20	600.00	N/C

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Date	Atty	Description	Hours	Rate	Amount
8/14/24	LM	Written correspondence with Alina N. Mamlyuk re: status report and updated summaries on avoidance actions and secured claims;	.10	540.00	54.00
8/14/24	AEd	Attend zoom meeting with Richard A. Marshack, D. Edward Hays, and Yosina Lissebeck re: priority claims, American Express and credit card claims and confirmation issues;	1.10	610.00	671.00
8/14/24	AEd	Review written correspondence from Yosina Lissebeck re: Debtor's employees and ADP and pre and post-petition transfer analysis from accountants and draft written correspondence re: blue cross claim and review response;	.60	610.00	366.00
8/15/24	LB	Review and revise status report;	.30	340.00	102.00
8/15/24	AEd	Draft written correspondence to Zev Shechtman re: Aaron E. de Leest representation of Trustee in LPG;	.10	610.00	61.00
8/15/24	AEd	Review American Express mediation brief;	.80	610.00	488.00
8/16/24	LB	Conference with Bradford N. Barnhardt re: motion to approve stipulation with Azzure for cash collateral;	.10	340.00	34.00
8/16/24	AEd	Review written correspondence from Richard A. Marshack and Trustee's Case Status Report;	.60	610.00	366.00
8/16/24	AEd	Telephone conference with Russ Squires re: LPG employees;	.10	610.00	61.00
8/17/24	LB	Conference with D. Edward Hays re: Still preparation of finance statement (.10); Draft finance statement (.30);	.40	340.00	136.00
8/19/24	LB	Review and finalize notice of hearing re: motion to approve stipulation with Azzure Capital for cash collateral (.20); Correspondence to parties re: notice of hearing re: same (.10);	.30	340.00	102.00
8/19/24	DND	Review of docket (No Charge);	.10	360.00	N/C
8/19/24	AEd	Telephone conference with Zev Shechtman re: LPG;	.50	610.00	305.00
8/19/24	AEd	Telephone conference with D. Edward Hays re: 2014 disclosure and blue cross priority claim and response to blue cross objection to plan;	.60	610.00	366.00
8/19/24	AEd	Review documents from Paychex and Pam Kraus and review Blue Cross proof of claim and supporting documents and prepare analysis of same and draft written correspondence to D. Edward Hays re: Blue Cross claim analysis;	2.50	610.00	1,525.00
8/19/24	AEd	Review D. Edward Hays comments on 2014 supplemental disclosure and revise same;	.50	610.00	305.00
8/20/24	AEd	Review written correspondence from Layla Buchanan re: 2014 disclosure and draft written response;	.40	610.00	244.00

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Date	Atty	Description	Hours	Rate	Amount
8/20/24	AEd	Review written correspondence from D. Edward Hays, David A. Wood and Layla Buchanan re: Supplement to Statement of Disinterestedness and review revised language and draft response;	.40	610.00	244.00
8/21/24	AEd	Telephone conference with Nick Koffroth re: reply in support of confirmation and Blue Cross claim;	.20	610.00	122.00
8/22/24	AEd	Review LPG Status Report, written correspondence from Richard A. Marshack an Yosina Lissebeck, and task list, analyze pending issues;	1.60	610.00	976.00
8/22/24	AEd	Review written correspondence from Zev Shechtman re: representation of Trustee in LPG (No Charge);	.10	610.00	N/C
8/22/24	AEd	Draft written correspondence to D. Edward Hays re: updating 2014 statement with MLG's consent to Aaron E. de Leest's representation of Trustee in non-MLG matters and review response;	.20	610.00	122.00
8/22/24	AEd	Draft memo to D. Edward Hays re: supplemental disclosure and review memos from Layla Buchanan and D. Edward Hays re: same;	.10	610.00	61.00
8/26/24	AEd	Telephone conference with Richard A. Marshack and Yosina Lissebeck re: claims analysis and plan confirmation preparation;	.90	610.00	549.00
8/27/24	AEd	Review written correspondence from Richard A. Marshack re: referral of J Trinh to state bar;	.10	610.00	61.00
8/27/24	AEd	Review written correspondence from Richard A. Marshack re: criminal referral letter to OUST;	.10	610.00	61.00
8/28/24	AEd	Conferences with Richard A. Marshack re: pending issues and priority claim objections;	.40	610.00	244.00
8/28/24	AEd	Prepare to attend confirmation hearing and prepare for hearing on Anthem motion to compromise;	1.10	610.00	671.00
8/28/24	AEd	Review June 12, 2023 preliminary injunction hearing transcript;	.90	610.00	549.00
8/29/24	AEd	Attend meeting with Richard A. Marshack and D. Edward Hays re: strategy, planning litigation, pending claims and avoidance power claims;	1.50	610.00	915.00
8/29/24	AEd	Travel to/from and attend hearing on motion to approve compromise with Anthem and plan confirmation hearing;	6.20	610.00	3,782.00
8/29/24	AEd	Attend lunch with Richard A. Marshack, D. Edward Hays, committee counsel and special counsel after plan confirmation hearing (No Charge);	1.00	610.00	N/C
9/03/24	AEd	Conference with Laila Masud re: pending projects and claim objections;	.20	610.00	122.00
9/03/24	AEd	Review written correspondences from Laila Masud re: claim objections and case management issues;	.20	610.00	122.00

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Date	Atty	Description	Hours	Rate	Amount
9/03/24	AEd	Review written correspondence from [REDACTED] and respond, draft written correspondence to Richard A. Marshack, D. Edward Hays and special counsel re: meeting and review responses;	.30	610.00	183.00
9/04/24	AEd	Attend meeting with [REDACTED], D. Edward Hays, Richard A. Marshack and Special counsel re: [REDACTED];	2.60	610.00	1,586.00
9/04/24	AEd	Prepare for [REDACTED];	.60	610.00	366.00
9/04/24	AEd	Review correspondence and text messages to/from Joon M. Khang to/from Tony Diab;	.50	610.00	305.00
9/11/24	DEH	Review and analyze order appointing monitor and written correspondence with Richard A. Marshack, Nancy Rapoport, and Aaron E. de Leest re: motion to extend term;	.30	740.00	222.00
9/11/24	DAW	Conference with Pam Kraus re: distributions;	.20	610.00	122.00
9/11/24	AEd	Review written correspondence from Richard A. Marshack, Chris Gio and Yosina Lissebeck re: Tony Diab settlement inquiry and request for meeting with Richard A. Marshack;	.10	610.00	61.00
9/11/24	AEd	Review entered Confirmation Order and written correspondence from D. Edward Hays re: effective date and review plan and calculate same and draft written correspondence in response;	.90	610.00	549.00
9/12/24	LM	Written correspondence with Alina N. Mamlyuk re: appeals of admin claims by Trinh parties and category creation for same;	.20	540.00	108.00
9/12/24	AEd	Review sale order and order appointing ethics compliance monitor;	.40	610.00	244.00
9/12/24	AEd	Review notices of appeal and review code re: timing of election of district court and draft written correspondence to Richard A. Marshack and D. Edward Hays re: election and review multiple responses;	.70	610.00	427.00
9/14/24	AEd	Review written correspondence from Yosina Lissebeck and D. Edward Hays re: effective date payments and meeting re: same;	.20	610.00	122.00
9/17/24	AEd	Telephone conference with D. Edward Hays, Yosina Lissebeck re: effective date payments and related issues;	.30	610.00	183.00
9/17/24	AEd	Telephone conference with with Pam Kraus re: effective date payments;	.40	610.00	244.00
9/17/24	AEd	Review written correspondence from D. Edward Hays re: Election to District Court and procedure for same, review FRBP 8005(b) and draft written response;	.30	610.00	183.00

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Date	Atty	Description	Hours	Rate	Amount
9/18/24	AEd	Telephone conference with Richard A. Marshack re: pending issues and partial telephone conference with Bill Mitchell re: inquiry from OCDA and other issues;	.30	610.00	183.00
9/18/24	AEd	Review written correspondence from Yosina Lissebeck re: Effective Date duties and draft written response to Nick Koffroth re: same;	.20	610.00	122.00
9/18/24	AEd	Review written correspondence from Kim Steverson re: notice of confirmation order;	.10	610.00	61.00
9/18/24	AEd	Draft script for reception to use in response to inquires from creditors and claimants;	.40	610.00	244.00
9/18/24	AEd	Leave voice message for Nick Koffroth re: effective date duties;	.10	610.00	61.00
9/19/24	AEd	Telephone conference with Nick Koffroth re: effective date issues;	.30	610.00	183.00
9/19/24	AEd	Telephone conference with Richard A. Marshack re: pending issues, effective date, and claim objections;	.10	610.00	61.00
9/19/24	AEd	Review notice of effective date and review plan and confirmation order and revise notice to include administrative claims bar date;	1.30	610.00	793.00
9/19/24	AEd	Telephone conference with Chris Celintino and Yosina Lissebeck re: effective date issues;	.20	610.00	122.00
9/19/24	AEd	Review notice of court costs for effective date payments and draft written correspondence to Pam Kraus re: same and review response;	.20	610.00	122.00
9/19/24	AEd	Draft written correspondence to Yosina Lissebeck re: notice of rejection and review written response;	.20	610.00	122.00
9/19/24	AEd	Review written correspondence from Richard A. Marshack and D. Edward Hays re: dissolution of the debtor and timing of same (multiple);	.40	610.00	244.00
9/20/24	AEd	Telephone conference with D. Edward Hays re: CFPB subpoena issues;	.10	610.00	61.00
9/20/24	AEd	Review subpoena from CFPB and draft written correspondence to Richard A. Marshack and D. Edward Hays with analysis and recommendation re: same;	1.10	610.00	671.00
9/20/24	AEd	Review written correspondence from Yosina Lissebeck re: rejection notice additional parties to serve;	.10	610.00	61.00
9/23/24	DEH	Telephone conference with Richard A. Marshack and Aaron E. de Leest re: pending matters;	.20	740.00	148.00
9/23/24	DND	E-mail correspondence with Chad V. Haes and Kathleen Frederick re: access to Dinsmore sharefile;	.10	360.00	36.00
9/23/24	AEd	Telephone conference with Richard A. Marshack and Yosina Lissebeck re: pending issues and meeting re: same;	.20	610.00	122.00

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Date	Atty	Description	Hours	Rate	Amount
9/23/24	AEd	Telephone conference with Alina N. Mamlyuk re: pending claim objections, litigation projects, and appeals;	.40	610.00	244.00
9/23/24	AEd	Telephone conference with Richard A. Marshack and Yosina Lissebeck re: claim objections, litigation projects and claims, and pending issues;	1.10	610.00	671.00
9/23/24	AEd	Telephone conference with Richard A. Marshack re: Pending projects and Marshack Hays tasks and status of same;	.60	610.00	366.00
9/23/24	AEd	Review open tasks memo from Yosina Lissebeck and prepare analysis of additional tasks and prepare for conference with Richard A. Marshack and Yosina Lissebeck;	.90	610.00	549.00
9/23/24	AEd	Review notice of effective date and notice of rejection and draft memos to Nick Koffroth and D. Edward Hays re: same and review responses;	1.20	610.00	732.00
9/23/24	AEd	Review designation of record filed by Trinh and Grayson and review BAP dockets in Trinh and Greyson Appeals, status of removal to district court, and draft written correspondence to D. Edward Hays and Alina N. Mamlyuk re: same;	1.10	610.00	671.00
9/23/24	AEd	Draft memos to Yosina Lissebeck and Richard A. Marshack re: CFPB subpoena;	.10	610.00	61.00
9/23/24	AEd	Review written correspondence from Richard A. Marshack re: pending issues and to do list;	.10	610.00	61.00
9/23/24	AEd	Draft written correspondence to Yosina Lissebeck re: pending tasks and task chart and review response;	.10	610.00	61.00
Sub-Total Fees:			45.70		\$ 27,005.00

5 Claims Administration and Objections

Date	Atty	Description	Hours	Rate	Amount
8/05/24	DEH	Telephone conference with Richard A. Marshack re: objection to priority claims;	.20	740.00	148.00
8/06/24	BNB	Written correspondence with D. Edward Hays re: draft order granting omnibus secured claim objection;	.10	410.00	41.00
8/08/24	DEH	Telephone conference with Nick Koffroth re: stipulation with Azzure, fee applications, and objections to priority claims;	.20	740.00	148.00

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Date	Atty	Description	Hours	Rate	Amount
8/08/24	DEH	Review and revise proposed order granting omnibus objection to secured claims (.40); Written correspondence with Bradford N. Barnhardt re: same (.10);	.50	740.00	370.00
8/10/24	DEH	Draft written correspondence to Aaron E. de Leest and Bradford N. Barnhardt re: objections to various claims including detailed background and bases for same;	.40	740.00	296.00
8/11/24	DEH	Written correspondence with Josh Temple and Dimple Mehra re: records to support objection to IRS priority claim;	.30	740.00	222.00
8/11/24	DEH	Written correspondence with Nick Koffroth and Yosina Lissebeck re: Resolution Ventures and resolution of intended objection;	.20	740.00	148.00
8/12/24	DEH	Written correspondence with Chad Kurtz and Josh Teeple re: objection to IRS claim;	.20	740.00	148.00
8/12/24	BNB	Written correspondence with D. Edward Hays re: drafting claim objections;	.40	410.00	164.00
8/12/24	AEd	Review written correspondence from D. Edward Hays re: claim objections and review written correspondence from Bradford N. Barnhardt re: same;	.20	610.00	122.00
8/12/24	AEd	Review memo from Richard A. Marshack re: claim objections and strategy re: supervision of same;	.10	610.00	61.00
8/12/24	AEd	Review written correspondence from Chad Kurtz, Josh Teeple, and Dimple Mehra re: Estate returns and IRS claim;	.20	610.00	122.00
8/13/24	BNB	Draft settlement letter to Blue Cross re: proof of claim #64;	1.70	410.00	697.00
8/14/24	DEH	Written correspondence with Russ Squires, Eeyah Tan, and Aaron E. de Leest re: payroll records and evidence to support objection to Blue Cross claim;	.20	740.00	148.00
8/14/24	BNB	Draft objection to Section 507(a)(7) priority claims, including written correspondence with Yosina Lissebeck re: information needed;	4.60	410.00	1,886.00
8/14/24	BNB	Telephone conference with Layla Buchanan re: isolating section 507(a)(7) priority claims;	.10	410.00	41.00
8/14/24	BNB	Written correspondence with D. Edward Hays re: Blue Cross priority claim demand letter and date when Debtor did not have employees;	.10	410.00	41.00
8/14/24	AEd	Review written correspondence from Bradford N. Barnhardt re: claim objections, review local rules, and draft written response;	.10	610.00	61.00
8/14/24	AEd	Review written correspondence from Bradford N. Barnhardt and Yosina Lissebeck re: priority claim analysis and objections;	.20	610.00	122.00

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Date	Atty	Description	Hours	Rate	Amount
8/15/24	DEH	Written correspondence with Aaron E. de Leest re: obtaining payroll records to determine if Blue Cross premiums benefitted LPG employees or employees of fraudulently transferred assets;	.20	740.00	148.00
8/15/24	BNB	Written correspondence with Kim Steverson re: sharevault access for claim analysis;	.10	410.00	41.00
8/15/24	BNB	Draft objection to duplicative proof of claims;	1.30	410.00	533.00
8/15/24	BNB	Draft letter to Affirma's counsel (Jeffrey Golden and Eric Bensamochan) re: withdrawal of proof of claim no. 2224-1;	1.30	410.00	533.00
8/15/24	BNB	Update claim objection to Section 507(a)(7) claims exceeding statutory cap;	.60	410.00	246.00
8/15/24	AEd	Review written correspondence from Yosina Lissebeck re: Blue Cross priority claim;	.10	610.00	61.00
8/15/24	AEd	Review written correspondence from Nick Kofferoth re: Blue Cross claim;	.10	610.00	61.00
8/16/24	BNB	Review and revise objection to duplicative claims;	.30	410.00	123.00
8/16/24	BNB	Telephone conference with Layla Buchanan re: revisions to order to show cause for Azzure cash collateral motion;	.10	410.00	41.00
8/16/24	BNB	Review and revise letter to Affirma's counsel re: Celso Leanos's claim;	.30	410.00	123.00
8/16/24	BNB	Review and revise letter to Blue Cross re: proof of claim;	.10	410.00	41.00
8/16/24	BNB	Review and revise section 507(a)(7) omnibus priority objection;	.90	410.00	369.00
8/16/24	ANM	Drafted and sent e-mail correspondence to Aaron E. de Leest re: ADP records that may help with Blue Cross priority claim;	.10	500.00	50.00
8/16/24	ANM	Telephone conference with Aaron E. de Leest re: employee records needed for verification of Blue Anthem's claim (.10); Drafted and sent e-mail correspondence to ADP and to Paychex contacts trying to obtain said employee records (.30);	.40	500.00	200.00
8/16/24	AEd	Telephone conference with Pam Kraus re: LPG employees;	.10	610.00	61.00
8/16/24	AEd	Telephone conference with Alina N. Mamlyuk re: LPG employee claims;	.10	610.00	61.00
8/16/24	AEd	Review LPG employee priority claim list and compare same to payroll register;	.80	610.00	488.00
8/16/24	AEd	Review written correspondence from Josh Teeple and Dimple Mehra re: Debtor's accounting and payroll records and draft written response;	.30	610.00	183.00

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Date	Atty	Description	Hours	Rate	Amount
8/16/24	AEd	Review written correspondence from D. Edward Hays and Yosina Lissebeck re: debtor's payroll records;	.10	610.00	61.00
8/16/24	AEd	Review written correspondence from Alina N. Mamlyuk re: LPG paychex records and respond;	.20	610.00	122.00
8/16/24	AEd	Review written correspondence from Keith Owens re: Blue Cross claim objection;	.10	610.00	61.00
8/19/24	AEd	Review written correspondence from Bradford N. Barnhardt re: priority claim objections;	.10	610.00	61.00
8/19/24	AEd	Review written correspondence from Alexander Harth re: paychex records;	.10	610.00	61.00
8/19/24	AEd	Review written correspondence from Glenn Moses re: ADP records;	.10	610.00	61.00
8/20/24	DEH	Written correspondence with Nick Koffroth and Yosina Lissebeck re: facts and strategies for objection to Blue Cross claim;	.20	740.00	148.00
8/20/24	DEH	Written correspondence with Aaron E. de Leest re: Blue Cross's receipt of transfers during preference period, potential defenses, and potential Section 502(d) claims;	.20	740.00	148.00
8/20/24	ANM	Conference with Aaron E. de Leest re: priority claims' evidence overlap with evidence that was used in investigating and verifying administrative claims;	.30	500.00	150.00
8/20/24	AEd	Conference with Alina N. Mamlyuk re: priority claims' evidence overlap with evidence that was used in investigating and verifying administrative claims;	.30	610.00	183.00
8/20/24	AEd	Review written correspondence from Nicholas Cooper re: payments to Blue Cross and Paychex and review report and analyze same;	1.20	610.00	732.00
8/20/24	AEd	Telephone conference with Alan Forsley re: Blue Cross proof of claim and payments to Blue Cross;	.30	610.00	183.00
8/20/24	AEd	Further review of employment documents and Blue Cross claim;	1.70	610.00	1,037.00
8/20/24	AEd	Review written correspondence from Chad Kurtz re: IRS claim and records;	.10	610.00	61.00
8/20/24	AEd	Draft written correspondence to D. Edward Hays re: potential blue cross preference and review written response;	.20	610.00	122.00
8/21/24	DEH	Telephone conference with Aaron E. de Leest re: Blue Cross claim analysis and settlement proposal;	.20	740.00	148.00
8/21/24	DEH	Telephone conference with Aaron E. de Leest re: evaluation of preference claims against and potential defenses of Blue Cross;	.30	740.00	222.00

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Date	Atty	Description	Hours	Rate	Amount
8/21/24	LB	Review and revise stipulation re: treatment of claim of Jennifer McLaughlin (.10); Correspondence to Jennifer McLaughlin re: same (.10);	.20	340.00	68.00
8/21/24	BNB	Telephone conference with Aaron E. de Leest re: drafting omnibus objection to duplicative claims;	.10	410.00	41.00
8/21/24	BNB	Written correspondence with Aaron E. de Leest re: claims analysis spreadsheet;	.10	410.00	41.00
8/21/24	AEd	Telephone conference with D. Edward Hays re: Blue Cross claim analysis and settlement proposal;	.20	610.00	122.00
8/21/24	AEd	Telephone conference with Bradford N. Barnhardt re: drafting omnibus objection to duplicative claims;	.10	610.00	61.00
8/21/24	AEd	Review and revise priority deposit claim omnibus objection;	.80	610.00	488.00
8/21/24	AEd	Review and revise draft priority claim objection to duplicate claims;	.90	610.00	549.00
8/21/24	AEd	Revise letter to Jeff Golden re: Celso Leanos Claim;	.40	610.00	244.00
8/21/24	AEd	Review written correspondence from Nicholas Cooper re: Blue Cross transactions and analyze same and review and update preference analysis;	.60	610.00	366.00
8/21/24	AEd	Review written correspondence from Eric Goldstein re: blue cross payments and invoices and forward same to D. Edward Hays;	.20	610.00	122.00
8/22/24	DEH	Written correspondence with Richard A. Marshack and Aaron E. de Leest re: settlement terms with Blue Cross;	.20	740.00	148.00
8/22/24	BNB	Written correspondence with Aaron E. de Leest re: identifying duplicate claims, and research re: omnibus claim objections based on duplication;	.30	410.00	123.00
8/22/24	AEd	Review written correspondence from Eric Goldstein re: Blue Cross priority claim and settlement offer re: same and draft written response;	.40	610.00	244.00
8/22/24	AEd	Telephone conference with Eric Goldstein re: Blue Cross counter-offer;	.10	610.00	61.00
8/22/24	AEd	Telephone conference with Richard A. Marshack and D. Edward Hays re: Blue Cross offer and response to same;	.30	610.00	183.00
8/22/24	AEd	Draft memo to Richard A. Marshack and D. Edward Hays re: Blue Cross offer and review written response from D. Edward Hays;	.10	610.00	61.00
8/22/24	AEd	Review written correspondence from Bradford N. Barnhardt re: priority claim objections;	.10	610.00	61.00
8/23/24	DEH	Written correspondence with David M. Goodrich re: United Partnership's claim;	.10	740.00	74.00

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Date	Atty	Description	Hours	Rate	Amount
8/23/24	LB	Correspondence to David Goodrich re: stipulation to continue briefing schedule re: United Partnership administrative motion;	.10	340.00	34.00
8/23/24	LB	Review and finalize stipulation re: treatment of administrative claim with Jennifer McLaughlin (.20); Draft proposed order re: same (.30);	.50	340.00	170.00
8/23/24	AEd	Draft application for order shortening time for motion to approve compromise with Anthem;	.70	610.00	427.00
8/23/24	AEd	Draft Order on Application for Order Shortening Time re: Anthem Settlement;	.50	610.00	305.00
8/23/24	AEd	Prepare motion to compromise with Anthem/Blue Cross;	5.60	610.00	3,416.00
8/26/24	LB	Review and finalize stipulation with Jennifer McLaughlin (.20); Review and finalize proposed order re: same (.10);	.30	340.00	102.00
8/26/24	LB	Draft declaration of Aaron E. de Leest in support of application for order shortening time re: motion to approve compromise with Blue Cross;	.40	340.00	136.00
8/26/24	LB	Review and revise stipulation with Herret Credit Consultants re: administrative motion (.10); Correspondence to Eric Gassman re: same (.10); Draft order approving stipulation to modify briefing schedule with Herret Credit Consultants (.20);	.40	340.00	136.00
8/26/24	LB	Draft order approving stipulation to modify briefing schedule with United Partnership;	.20	340.00	68.00
8/26/24	LB	Draft stipulation to modify briefing schedule with Alteryx;	.40	340.00	136.00
8/26/24	AEd	Telephone conference with Eric Goldstein re: Anthem settlement;	.10	610.00	61.00
8/26/24	AEd	Revise motion to compromise with Anthem and declaration of Richard A. Marshack;	2.80	610.00	1,708.00
8/26/24	AEd	Draft term sheet with Anthem;	1.90	610.00	1,159.00
8/26/24	AEd	Telephone conference with with Richard A. Marshack re: Anthem Settlement;	.20	610.00	122.00
8/26/24	AEd	Review claims chart from Force10 and analyze same for priority claim objections;	1.20	610.00	732.00
8/26/24	AEd	Review written correspondence from Eric Goldstein re: Anthem withdrawal of objection and settlement agreement and draft written responses;	.40	610.00	244.00
8/26/24	AEd	Review written correspondence from Yosina Lissebeck and Josh Teeple re: tax claims and other priority claims;	.30	610.00	183.00
8/26/24	AEd	Review written correspondence form Yosina Lissebeck re: priority wage claims and duplicates and review Dinsmore claims on sharefile;	.50	610.00	305.00

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Date	Atty	Description	Hours	Rate	Amount
8/27/24	DEH	Written correspondence with Josh Teeple and others re: status of investigation to prepare debtor's outstanding tax returns to determine if IRS and FTB claims based on estimates can be reduced or eliminated;	.20	740.00	148.00
8/27/24	DEH	Review and analyze orders entered by court denying motions for allowance of administrative claims by Greyson and Trinh (1.20); Conference with Richard A. Marshack re: same (.30);	1.50	740.00	1,110.00
8/27/24	DEH	Written correspondence with Aaron E. de Leest re: status of pending and imminent objections to priority claims;	.40	740.00	296.00
8/27/24	LB	Review and finalize compromise motion with Anthem (.30); Review and finalize application and order for order shortening time re: same (.30); Conference with Aaron E. De Leest re: same (.10); Draft notice of motion (.30); Draft declaration re: service and notice of same (.50); Telephonic notice to interested parties (.20); Draft correspondence re: notice of hearing (.10);	1.80	340.00	612.00
8/27/24	KAT	Review order on Greyson admin claim for purposes of future claim work (.40);	.40	650.00	260.00
8/27/24	KAT	Review Blue Cross stipulation for purposes of future claims work (.10);	.10	650.00	65.00
8/27/24	LM	Conference with Bradford N. Barnhardt and Aaron E. de Leest re: telephonic notice for order shortening time (.10);	.10	540.00	54.00
8/27/24	BNB	Review Blue Cross Anthem letter for revisions by Aaron E. de Leest (No Charge);	.10	410.00	N/C
8/27/24	BNB	Review letter to Jeff Golden re: Affirma and Celso Leanos proof of claims;	.20	410.00	82.00
8/27/24	BNB	Conference with Aaron E. de Leest re: priority claim objections;	.10	410.00	41.00
8/27/24	BNB	Conference with Laila Masud and Aaron E. de Leest re: telephonic notice for order shortening time (.10); Written correspondence with Aaron E. de Leest re: same (.10);	.20	410.00	82.00
8/27/24	BNB	Written correspondence with Aaron E. de Leest re: authority for claim objection based on lack of documentary support;	.20	410.00	82.00
8/27/24	BNB	Draft demand letter to Unified Global Research Group re: Section 507(a)(7) priority claims;	.70	410.00	287.00
8/27/24	BNB	Draft omnibus objection to duplicative proof of claims;	.60	410.00	246.00
8/27/24	BNB	Written correspondence with Aaron E. de Leest and Layla Buchanan re: service of letter to Affirma's counsel re: withdrawal of Celso Leanos proof of claims;	.10	410.00	41.00
8/27/24	DND	Review of motion to approve compromise with Blue Cross;	.20	360.00	72.00

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Date	Atty	Description	Hours	Rate	Amount
8/27/24	AEd	Revisions to 9019 motion with Anthem/Blue Cross;	.80	610.00	488.00
8/27/24	AEd	Conference with Bradford N. Barnhardt re: priority claim objections;	.10	610.00	61.00
8/27/24	AEd	Conference with Laila Masud and Bradford N. Barnhardt re: telephonic notice for order shortening time (.10); Written correspondence with Aaron E. de Leest re: same (.10);	.20	610.00	122.00
8/27/24	AEd	Review fourteen proofs of claim filed by Olga Esquivel and analyze same and prepare Excel chart for claim objection;	1.60	610.00	976.00
8/27/24	AEd	Research and begin drafting objection to fourteen priority claims filed by Olga Esquivel;	3.10	610.00	1,891.00
8/27/24	AEd	Finalize motion to compromise, review application for order shortening time and proposed order (.40); Review entered order shortening time (.10); Review notice and declaration re: service (.20);	.70	610.00	427.00
8/27/24	AEd	Telephone conferences with Court clerk re: application for order shortening time and order shortening time;	.20	610.00	122.00
8/27/24	AEd	Review order denying Greyson admin claim;	.50	610.00	305.00
8/27/24	AEd	Draft written correspondence to Layla Buchanan re: compromise motion with Anthem and application for order shortening time, order and notice, and review written responses from Layla Buchanan;	.30	610.00	183.00
8/27/24	AEd	Review written correspondence re: objection to Olga Esquivel claims;	.10	610.00	61.00
8/27/24	AEd	Review written correspondence from D. Edward Hays re: priority claim objections and draft written response with analysis and status of pending objections;	.40	610.00	244.00
8/27/24	AEd	Review written correspondence from Richard A. Marshack re: Anthem term sheet and draft written response;	.20	610.00	122.00
8/28/24	DEH	Conferences with Richard A. Marshack and Aaron E. de Leest re: priority claim of Olga Esquivel;	.50	740.00	370.00
8/28/24	AEd	Conferences with D. Edward Hays and Richard A. Marshack re: priority claim of Olga Esquivel;	.50	610.00	305.00
8/28/24	AEd	Draft objection to claims of Olga Esquivel;	1.70	610.00	1,037.00
8/28/24	AEd	Review Order And Memorandum Decision Denying Application For Administrative Claim Of Han Trinh and separate Order And Memorandum Decision Denying Application For Administrative Claim Of Jade Trinh;	.50	610.00	305.00
8/29/24	AEd	Review motion to compromise with Anthem in preparation for hearing;	.20	610.00	122.00

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Date	Atty	Description	Hours	Rate	Amount
8/29/24	AEd	Draft written correspondence to Layla Buchanan re: Trustee's original declaration in support of motion to compromise with Anthem and review written response;	.10	610.00	61.00
8/29/24	AEd	Telephone conference with Layla Buchanan re: Trustee's original declaration in support of Anthem motion to compromise;	.10	610.00	61.00
8/30/24	BNB	Telephone conference with Aaron E. de Leest re: plan confirmation and claim objections;	.10	410.00	41.00
8/30/24	BNB	Draft demand letters to Goldman Sachs and Unified Global re: asserted Section 507(a)(7) priority claims;	.90	410.00	369.00
8/30/24	BNB	Review and revise omnibus objection to duplicative proofs of claims;	.30	410.00	123.00
8/30/24	BNB	Review and revise Section 507(a)(7) omnibus claim objection, including completing list of claims exceeding statutory cap;	1.10	410.00	451.00
8/30/24	BNB	Draft omnibus objection to incomplete proof of claims;	1.30	410.00	533.00
8/30/24	AEd	Telephone conference with Bradford N. Barnhardt re: plan confirmation and claim objections;	.10	610.00	61.00
8/30/24	AEd	Telephone conferences (2) with Alina N. Mamlyuk re: administrative and priority claim objections;	1.40	610.00	854.00
8/30/24	AEd	Telephone conferences (2) with Yosina Lissebeck re: administrative and priority claim objections and analysis of same;	1.90	610.00	1,159.00
8/30/24	AEd	Analyze priority and administrative claims in preparation of objections prior to effective date;	5.60	610.00	3,416.00
8/30/24	AEd	Review written correspondence from Yosina Lissebeck re: Tax claims and response from Josh Teeple;	.10	610.00	61.00
8/30/24	AEd	Draft written correspondence to Alina N. Mamlyuk re: objection to other administrative claims and review written response;	.10	610.00	61.00
9/02/24	AEd	Review written correspondence from Pam Kraus and written correspondence from Yosina Lissebeck re: Chase secured claim;	.20	610.00	122.00
9/03/24	LM	Conference with Aaron E. de Leest re: priority claims status and objections to same and effective date interpretation in relation to same;	.30	540.00	162.00
9/03/24	ANM	Telephone conference with Aaron E. de Leest re: priority claim objections;	.10	500.00	50.00
9/03/24	ANM	Telephone conference with Jeremy Freedman re: priority claim objections, local bankruptcy rules concerning omnibus objection and deadlines;	.20	500.00	100.00

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Date	Atty	Description	Hours	Rate	Amount
9/03/24	AEd	Telephone conferences with Richard A. Marshack re: claim objections, partial with Alina N. Mamlyuk and Richard A. Marshack;	.30	610.00	183.00
9/03/24	AEd	Analyze priority claims and other objections and review priority claims in preparation of objections to be filed before effective date of the plan;	3.40	610.00	2,074.00
9/03/24	AEd	Telephone conference with Alina N. Mamlyuk re: priority claim objections;	.10	610.00	61.00
9/03/24	AEd	Review written correspondence from Bradford N. Barnhardt re: priority claim objections;	.10	610.00	61.00
9/03/24	AEd	Draft written correspondence to Yosina Lissebeck re: United Global Research Group claim and review written response;	.10	610.00	61.00
9/03/24	AEd	Draft written correspondence to Yosina Lissebeck re: priority claim objections;	.10	610.00	61.00
9/04/24	ANM	Telephone conference with Jeremy Freedman about Local Bankruptcy Rule 3007 and its relevance to the omnibus objection to be drafted;	.10	500.00	50.00
9/04/24	AEd	Telephone conference with Yosina Lissebeck re: claim objections;	.50	610.00	305.00
9/04/24	AEd	Review and analyze claims for priority claim objections;	2.90	610.00	1,769.00
9/04/24	AEd	Review written correspondence from Bradford N. Barnhardt re: 507(a)(7) priority claim omnibus objection and duplicate claim objection and review early drafts of each objection;	.90	610.00	549.00
9/04/24	AEd	Conduct research for priority claim objections;	.60	610.00	366.00
9/04/24	AEd	Review written correspondence from Pam Kraus re: non-employees that made priority claims;	.20	610.00	122.00
9/04/24	AEd	Review written correspondence from Yosina Lissebeck re: Priority and Other Claims Objections being handled by special counsel;	.10	610.00	61.00
9/05/24	DEH	Telephone conference with Aaron E. de Leest re: objections to priority claims (.30); Telephone conference with Richard A. Marshack re: same (.20);	.50	740.00	370.00
9/05/24	DEH	Written correspondence with Aaron E. de Leest and Bradford N. Barnhardt re: objections to priority claims;	.20	740.00	148.00
9/05/24	AEd	Leave voicemail for Yosina Lissebeck re: claim objections;	.10	610.00	61.00
9/05/24	AEd	Telephone conference with D. Edward Hays re: claims review and claim objections and strategy re: same;	.30	610.00	183.00

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Date	Atty	Description	Hours	Rate	Amount
9/05/24	AEd	Draft detailed written correspondence to Bradford N. Barnhardt and D. Edward Hays re: 507(a)(4) and (a)(7) priority claims and claim objections and review response from D. Edward Hays;	1.40	610.00	854.00
9/05/24	AEd	Complete and revise draft of objection to priority and administrative claims of Olga Esquivel and draft declarations and request for judicial notice;	3.30	610.00	2,013.00
9/05/24	AEd	Review and analyze priority claims for claim objections;	1.60	610.00	976.00
9/06/24	ANM	Telephone conference with Richard A. Marshack re: admin claimant Alteryx's settlement offer;	.30	500.00	150.00
9/11/24	DEH	Written correspondence with Richard A. Marshack, Yosina Lissebeck, and Alina N. Mamlyuk re: electing district court in appeals of orders denying motions for administrative claims;	.20	740.00	148.00
9/11/24	DEH	Telephone conference with Aaron E. de Leest re: effective date payments (.30); Telephone conference with Nick Koffroth and Keith Owens re: same and Trustee's and U.S. Trustee's requested extension of time to respond to fee applications (.20);	.50	740.00	370.00
9/11/24	CVH	E-mails with Tyler Powell re: claim objections (.20);	.20	600.00	120.00
9/11/24	BNB	Written correspondence with Layla Buchanan re: finalizing Section 507(a)(7) omnibus objection;	.40	410.00	164.00
9/11/24	BNB	Review list of priority claims for duplicates for omnibus claim objection;	1.20	410.00	492.00
9/11/24	BNB	Draft e-mail to Kathy MacDonald re: inquires about proof of claim nos. 1791 and 1797 to investigate potential objections;	.30	410.00	123.00
9/11/24	BNB	Conference with Aaron E. de Leest re: claim objections;	.10	410.00	41.00
9/11/24	AEd	Review written correspondence from Anthem's counsel re: Effective Date payment and respond and draft written correspondence to Pam Kraus re: same and review responses;	.30	610.00	183.00
9/11/24	AEd	Review priority and administrative tax claims and analyze same and draft written correspondence to D. Edward Hays, Richard A. Marshack, special counsel and committee counsel re: analysis;	3.80	610.00	2,318.00
9/11/24	AEd	Telephone conference with D. Edward Hays re: priority and administrative tax claims;	.30	610.00	183.00
9/11/24	AEd	Conference with Bradford N. Barnhardt re: claim objections;	.10	610.00	61.00
9/11/24	AEd	Review priority claim of Patricia Hernandez and draft written correspondence to Bradford N. Barnhardt re: including claim in omnibus objection to priority wage claims;	.30	610.00	183.00
9/11/24	AEd	Review written correspondence from Richard A. Marshack re: Texas Controller claim and respond;	.10	610.00	61.00

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Date	Atty	Description	Hours	Rate	Amount
9/12/24	BNB	Telephone conference with Aaron E. de Leest re: steps to finalize various priority claim objections;	.50	410.00	205.00
9/12/24	BNB	Send e-mail to Kathy MacDonald re: inquires about proof of claim nos. 1791 and 1797 to investigate potential objections;	.10	410.00	41.00
9/12/24	BNB	Written correspondence with Omni Agent Solutions re: accessing priority claims not on claims register;	.10	410.00	41.00
9/12/24	BNB	Draft omnibus objection to claims exceeding Section 507(a)(4) statutory cap;	2.40	410.00	984.00
9/12/24	BNB	Draft omnibus objection to Section 507(a)(4) priority claims of non-employees;	3.20	410.00	1,312.00
9/12/24	AEd	Telephone conference with Bradford N. Barnhardt re: steps to finalize various priority claim objections;	.50	610.00	305.00
9/12/24	AEd	Review written correspondence from Bradford N. Barnhardt re: Kathy MacDonald claims;	.10	610.00	61.00
9/12/24	AEd	Review written correspondence from Dimple Mehra re: priority tax claims and draft written response;	.20	610.00	122.00
9/12/24	AEd	Review written correspondence from Josh Teeple and Yosina Lissebeck re: priority tax claims;	.10	610.00	61.00
9/12/24	AEd	Review written correspondence from Bradford N. Barnhardt re: 507(a)(4) non-employee objection and respond;	.20	610.00	122.00
9/13/24	DEH	Review amended claim filed Illinois (.10); Written correspondence with Aaron E. de Leest re: same (.10);	.20	740.00	148.00
9/13/24	LB	Review and redact claims for claim objections re: non employees and exceeding statutory cap;	.80	340.00	272.00
9/13/24	BNB	Attempt to call and leave voicemail for Kathy MacDonald re: inquiries about her proof of claims;	.10	410.00	41.00
9/13/24	BNB	Telephone conference with Layla Buchanan re: login information for Omni Share Vault for claims analysis;	.10	410.00	41.00
9/13/24	BNB	Telephone conference with Layla Buchanan re: preparing table for omnibus Section 507(a)(7) objection;	.10	410.00	41.00
9/13/24	BNB	Second attempt to call Kathy MacDonald re: inquiries about her proof of claims;	.10	410.00	41.00
9/13/24	BNB	Written correspondence with Omni re: status of priority claims not on claims register for review;	.10	410.00	41.00
9/13/24	BNB	Finish drafting objection to Section 507(a)(4) claims exceeding statutory cap;	.40	410.00	164.00

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Date	Atty	Description	Hours	Rate	Amount
9/13/24	BNB	Finish drafting objection to Section 507(a)(4) claims of non-employees;	.80	410.00	328.00
9/13/24	BNB	Complete omnibus objection to duplicative proof of claims;	1.70	410.00	697.00
9/13/24	AEd	Review Objection to Claim of Unified Global Research Group;	.30	610.00	183.00
9/13/24	AEd	Review written correspondence from D. Edward Hays re: Illinois Department of Employment Security priority claim, review same, and draft written response;	.40	610.00	244.00
9/13/24	AEd	Begin reviewing priority tax claims;	1.50	610.00	915.00
9/13/24	AEd	Review written correspondence from Bradford N. Barnhardt re: 507(a)(4) objections;	.10	610.00	61.00
9/13/24	AEd	Draft written correspondence to Alina N. Mamlyuk re: administrative omnibus claim objections and review written responses;	.20	610.00	122.00
9/13/24	AEd	Draft written correspondence to Layla Buchanan re: priority claim objections;	.10	610.00	61.00
9/16/24	LB	Review and revise omnibus objection to Section 507(a)(4) Claims Exceeding Statutory Cap;	.50	340.00	170.00
9/16/24	LB	Review and revise omnibus objection to Section 507(a)(4) Claims of Non-Employees;	.80	340.00	272.00
9/16/24	LB	Review and revise omnibus objection to Priority Section 507(a)(7) claims;	1.80	340.00	612.00
9/16/24	LB	Review and revise evidence in support of objections to claims;	1.90	340.00	646.00
9/16/24	LB	Telephone conference with Layla Buchanan re: claim objections;	.10	340.00	34.00
9/16/24	BNB	Telephone conference with Aaron E. de Leest re: finalizing omnibus claim objections and objections to Section 503(b)(9) claims;	.30	410.00	123.00
9/16/24	BNB	Telephone conference with Layla Buchanan re: finalizing omnibus claim objections and treatment of exhibits;	.10	410.00	41.00
9/16/24	BNB	Written correspondence with Layla Buchanan re: redacting confidential information from omnibus claim objections;	.10	410.00	41.00
9/16/24	BNB	Telephone conference with Layla Buchanan re: list of Section 507(a)(7) claims;	.10	410.00	41.00
9/16/24	BNB	Telephone conference with Aaron E. de Leest re: finalizing claim objections including tables of claims and footnote re: duplicative claims;	.20	410.00	82.00
9/16/24	BNB	Telephone conference with Layla Buchanan re: potential claim objections based on lack of documentation;	.10	410.00	41.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
9/16/24	BNB	Finalize Section 507(a)(7) claim objection, including final review of potentially objectionable proof of claims;	.80	410.00	328.00
9/16/24	BNB	Finalize objection to duplicative proof of claims;	.20	410.00	82.00
9/16/24	BNB	Written correspondence with Kathy MacDonald (priority claimant) re: request that she call me to discuss her claims;	.10	410.00	41.00
9/16/24	BNB	Finalize objection to Section 507(a)(4) claims exceeding statutory cap;	.10	410.00	41.00
9/16/24	BNB	Review Aaron E. de Leest's revisions to motion to deny priority wage claims of non-employees of the debtor;	.10	410.00	41.00
9/16/24	ANM	Drafting omnibus objection to wrongfully labeled administrative claims;	1.40	500.00	700.00
9/16/24	ANM	Drafting omnibus objection to incorrectly designated administrative claims;	.50	500.00	250.00
9/16/24	ANM	Telephone conference with Aaron E. de Leest re: omnibus objection to claims incorrectly designated as administrative claims;	.10	500.00	50.00
9/16/24	ANM	Telephone conferences (2) with Aaron E. de Leest re: omnibus administrative claim objections;	.30	500.00	150.00
9/16/24	AEd	Draft written correspondence to Alina Malmyuk, Bradford N. Barnhardt, and Layla Buchanan re: claim objections;	.30	610.00	183.00
9/16/24	AEd	Telephone conferences (2) with Bradford N. Barnhardt re: priority claim objections;	.50	610.00	305.00
9/16/24	AEd	Review priority claim objection status and chart of claim objections;	.40	610.00	244.00
9/16/24	AEd	Telephone conferences (2) with Alina N. Mamlyuk re: omnibus administrative claim objections;	.30	610.00	183.00
9/16/24	AEd	Telephone conferences (multiple) with Layla Buchanan re: priority claim objections;	.50	610.00	305.00
9/16/24	AEd	Review 507(a)(4), 507(a)(7) and duplicate priority claim objections and draft written correspondence to Bradford N. Barnhardt re: revisions to objections and finalizing same;	1.90	610.00	1,159.00
9/16/24	AEd	Review written correspondence from Pam Kraus re: timing of effective date payments, review plan and draft detailed response;	.50	610.00	305.00
9/16/24	AEd	Review priority tax and administrative claims and analyze same;	2.40	610.00	1,464.00
9/16/24	AEd	Review written correspondence from Bradford N. Barnhardt re: priority claim objections and draft written response;	.20	610.00	122.00
9/16/24	AEd	Draft written correspondence to Layla Buchanan re: priority claim objections and review written responses;	.10	610.00	61.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/16/24	AEd	Draft written correspondence to Alina N. Mamlyuk re: omnibus administrative claim objection;	.10	610.00	61.00
9/16/24	AEd	Review local bankruptcy rules and central guide re: omnibus claim requirements and procedures and court's procedures and draft written correspondence to Layla Buchanan;	.50	610.00	305.00
9/16/24	AEd	Review written correspondence from Bradford N. Barnhardt re: redacting personal information from proofs of claims used in objections;	.10	610.00	61.00
9/16/24	AEd	Review written correspondence from Alina N. Mamlyuk re: omnibus claim objection and omnibus claim objection procedures;	.10	610.00	61.00
9/16/24	AEd	Review written correspondence from Bradford N. Barnhardt re: MacDonald claim;	.10	610.00	61.00
9/16/24	AEd	Review written correspondence from Yosina Lissebeck re: priority claim objections and respond;	.10	610.00	61.00
9/17/24	DEH	Telephone conference with Layla Buchanan re: court in which to file elections to proceed in district court re: three appeals of orders denying motions for allowance of administrative claims;	.20	740.00	148.00
9/17/24	DEH	Review and revise statements of election to proceed in district courts on appeals;	.20	740.00	148.00
9/17/24	DEH	Research re: FRBP 8005, 28 U.S.C. § 158, BAP litigants manual, and BAP local rules re: where to file appellee's statement of election (.30); Written correspondence with Alina N. Mamlyuk, Aaron E. de Leest, and Bradford N. Barnhardt re: same (.20);	.50	740.00	370.00
9/17/24	LB	Review and revise claim objection to Olga Lucia Esquivel (.60); Review and prepare evidence in support of same (.40);	1.00	340.00	340.00
9/17/24	LB	Draft notice of withdrawal of claim filed by Goldman Sachs/Kathy MacDonald;	.30	340.00	102.00
9/17/24	LB	Review and preparation of claims in support of objection to duplicative priority proofs of claim;	1.20	340.00	408.00
9/17/24	BNB	Finalize objection to proof of claims filed by non-employees of the Debtor;	.50	410.00	205.00
9/17/24	BNB	Telephone conference with Kathy MacDonald re: questions about her two proofs of claims (.10); Written correspondence with Aaron E. de Leest re: recap of call and how to resolve her claims (.10);	.20	410.00	82.00
9/17/24	BNB	Written correspondence with Aaron E. de Leest re: inclusion of Celso Leanos's claim in duplicate claim objection;	.10	410.00	41.00

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Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
9/17/24	BNB	Review notice of withdrawal of proof of claim no. 1791 filed by Kathy MacDonald on behalf of Goldman Sachs, and circulate notice to Kathy MacDonald for her review and execution;	.30	410.00	123.00
9/17/24	BNB	Circulate updated omnibus claim objections for final review, including final revisions to objections per instructions by Aaron E. de Leest;	.50	410.00	205.00
9/17/24	AEd	Telephone conference with Yosina Lissebeck re: priority claim objections;	.60	610.00	366.00
9/17/24	AEd	Review priority claim objections;	1.20	610.00	732.00
9/17/24	AEd	Review withdrawal of MacDonald/Goldman Sachs claim;	.20	610.00	122.00
9/17/24	AEd	Review priority tax and administrative tax claims;	2.80	610.00	1,708.00
9/17/24	AEd	Draft written correspondence to Bradford N. Barnhardt and D. Edward Hays re: duplicate priority claim of Celso Leanos and review written responses;	.30	610.00	183.00
9/17/24	AEd	Review written correspondence from Bradford N. Barnhardt re: MacDonald duplicate claims and draft written responses;	.30	610.00	183.00
9/17/24	AEd	Draft detailed written correspondence to Pam Kraus re: effective date priority claim payments;	.70	610.00	427.00
9/17/24	AEd	Review written correspondence from Bradford N. Barnhardt re: priority claim objections and briefly review revised objections and respond to Bradford N. Barnhardt re: same;	.40	610.00	244.00
9/17/24	AEd	Review and update objection to claims of Olga Esquivel and draft written correspondence to D. Edward Hays re: same;	.40	610.00	244.00
9/17/24	AEd	Review administrative expense chart and written correspondence form Yosina Lissebeck and draft written correspondence to Pam Kraus re: same with instructions for payment of allowed administrative claims;	.30	610.00	183.00
9/18/24	LB	Review and revise omnibus objections to claims improperly designated as administrative claims;	.90	340.00	306.00
9/18/24	LB	Conference with Kail Antonio re: preparation of claims in support of objection to alleged 11 U.S.C. Section 507(a)(4) priority claims that exceed statutory cap;	.20	340.00	68.00
9/18/24	ANM	Drafting Omnibus Objection to Improperly Designated Administrative Claims;	3.10	500.00	1,550.00
9/18/24	ANM	Drafting Omnibus Objection to 70 improperly Designated Administrative Claims;	1.70	500.00	850.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/18/24	AEd	Review written correspondence from Alina N. Mamlyuk re: omnibus administrative claim objection and review draft objection and draft written response;	.80	610.00	488.00
9/18/24	AEd	Review tax claims and confirmation notice service list and draft written correspondence to Yosina Lissebeck re: same;	.90	610.00	549.00
9/18/24	AEd	Review letter from Alaska Legal Services re: Lynn Jackson;	.20	610.00	122.00
9/18/24	AEd	Review written correspondence from Layla Buchanan re: claim objections and redacting personal information on claims attached to same;	.10	610.00	61.00
9/18/24	AEd	Review written correspondence from Yosina Lissebeck re: tax claim and notice issues and draft written responses;	.30	610.00	183.00
9/18/24	AEd	Review written correspondence from Pam Kraus re: priority and admin claim distributions, review ledger report re: same, and draft written response;	.40	610.00	244.00
9/18/24	AEd	Review status of pending priority and administrative claim objections and review chart re: same and confirm objections include the identified priority and administrative claims requiring an objection;	.80	610.00	488.00
9/18/24	SMP	Obtain proof of claims and prepare for attachment as exhibits 1-70 in support of Omnibus objection to claims improperly designated as administrative claims (5.10);	5.10	340.00	1,734.00
9/19/24	DEH	Telephone conference with Layla Buchanan re: objections to claims;	.20	740.00	148.00
9/19/24	DEH	Review and revise objection to priority employee wage claims filed by non-employees (.70); Telephone conference with Layla Buchanan re: same (.20);	.90	740.00	666.00
9/19/24	LB	Conference with D. Edward Hays re: preparation of claim objections;	.20	340.00	68.00
9/19/24	ANM	Drafting Objection to 70 Improperly Designated Administrative Claims;	1.20	500.00	600.00
9/19/24	AEd	Telephone conference with Alina N. Mamlyuk re: omnibus administrative claim objection;	.10	610.00	61.00
9/19/24	AEd	Review and update objection to priority claims of Esquivel and draft written correspondence to Layla Buchanan re: same;	.60	610.00	366.00
9/19/24	AEd	Draft written correspondence to Alina N. Mamlyuk re: omnibus administrative claim objection;	.10	610.00	61.00
9/19/24	AEd	Review written correspondence form Layla Buchanan re: hearing date for omnibus claim objections and finalizing objections;	.20	610.00	122.00

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Date	Atty	Description	Hours	Rate	Amount
9/19/24	SMP	Continued review and preparation of exhibits 1-70 in support of omnibus objection to claims improperly designated as administrative claims (2.70);	2.70	340.00	918.00
9/20/24	DEH	Review and revise objection to duplicate claims;	.70	740.00	518.00
9/20/24	DEH	Review and revise objection to priority deposit claims that exceed statutory cap;	.50	740.00	370.00
9/20/24	DEH	Review and revise objection to wage claims that exceed the statutory cap;	.50	740.00	370.00
9/20/24	DEH	Review and revise objection to claim filed by Olga Esquivel;	.50	740.00	370.00
9/20/24	DEH	Review and revise objection to 70 proofs of claim asserting administrative priority (.50); Telephone conference with Aaron E. de Leest re: same (.20);	.70	740.00	518.00
9/20/24	DEH	Telephone conference with Richard A. Marshack re: objections to claims;	.30	740.00	222.00
9/20/24	DEH	Telephone conference with Aaron E. de Leest re: objections to multiple omnibus objections to claims;	.20	740.00	148.00
9/20/24	DEH	Telephone conference with Layla Buchanan re: multiple omnibus objections to claims;	.20	740.00	148.00
9/20/24	LB	Review and revise omnibus claim objection to 507(a)(4) priority wage benefit claims filed by non-employees (.40); Review and revise omnibus claim objection to duplicative priority proofs of claim (.80); Review and revise omnibus objection to alleged 11 U.S.C. Section 507(a)(7) priority claims that exceed statutory cap (2.20); Review and revise omnibus objection to alleged 11 U.S.C. Section 507(a)(4) Priority Claims that Exceed Statutory Cap (.40); Multiple calls with Aaron E. de Leest re: revisions to claim objections (.30);	4.10	340.00	1,394.00
9/20/24	LB	Review and finalize omnibus claim objection to 507(a)(4) priority wage benefit claims filed by non-employees (.30); Review and finalize omnibus objection to alleged 11 U.S.C. Section 507(a)(7) priority claims that exceed statutory cap (.30); Review and finalize omnibus objection to alleged 11 U.S.C. Section 507(a)(4) Priority Claims that Exceed Statutory Cap (.30);	.90	340.00	306.00
9/20/24	LB	Review and revise objection to claims filed by Olga Esquivel;	.40	340.00	136.00
9/20/24	LB	Review and finalize objections to claims filed by Olga Esquivel (.20); Review, and finalize omnibus claim objection to duplicative priority proofs of claim (.80); Review and finalize omnibus objection to proofs of claim filed for alleged administrative claims (3.40);	4.40	340.00	1,496.00

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Date	Atty	Description	Hours	Rate	Amount
9/20/24	CB	Finalize motion re: objection to claim number 19, 1886, 2481, 1648, 100678, 1696, Brittany Weston, Gabrielle Bossley, Gabrielle Bossley, Jolanta Ramirez, Patricia PatriciaFlorez Hernandez and Victoria Dang;	.50	340.00	170.00
9/20/24	CB	Finalize Motion RE: Objection to Claim Number by Claimant 71, 83, 96, 1887, 2098 and 2104 by Jennifer Ann McLaughlin, Carl Oswald Wuestenhube, R. Reed Pruyn, Vincent Jackson, Kelly J. Adams and Ashley Lambert Bland;	.50	340.00	170.00
9/20/24	CB	Finalize Motion RE: Objection to Claim Number by Claimant 1944, 2041, 251, 101288, 100039, 100845, 68, 100346, 1965, 657, 1487, 102309, 102, 690, 100686, 1323, 1515, 399,100570, 2150, 2181, 100313, 1149, 2011 and 1985 Adrieon Bister, Adrieon Bister, Alexis Lynnette Johnson, Anita L. Coots, Anne Estergren, Barbara Cochran, Bonita MarieScott, Cameron David Nash, Cameron David Nash, Caranella Davis Johnson, Cecilia P. Rodriguez, Denis R Hutchinson, Dennis Theriault, Devyn Schneider, Duane Harper Jr., Jennifer Frazer, John or Rhonda McGuire, John Silverman, Robert S. Butler, Ronald Alan Molinario, Salif Quedraogo, Sarah Adelman, Sheriba Jackson, TatiyanaAltecor and Tatiyana Altecord;	.50	340.00	170.00
9/20/24	CB	Finalize Motion RE: Objection to Claim Number by Claimant 94,95,175,443,1221,1933,2035,2219, 100111, 100126, 100127, 100286, 100359, and 101298;	.50	340.00	170.00
9/20/24	BNB	Telephone conference with Aaron E. de Leest re: revisions to omnibus claim objections to add additional exhibits and supporting declarations;	.20	410.00	82.00
9/20/24	BNB	Telephone conference with Layla Buchanan re: adding superseding claims to omnibus duplicate claim objection;	.10	410.00	41.00
9/20/24	BNB	Second telephone conference with Layla Buchanan re: adding superseding claims to duplicate claim objection;	.10	410.00	41.00
9/20/24	BNB	Telephone conference with Aaron E. de Leest re: D. Edward Hays's review of omnibus claim objections and final revisions;	.10	410.00	41.00
9/20/24	BNB	Update declaration in support of non-employee omnibus claim objection to comply with local rules;	.20	410.00	82.00
9/20/24	BNB	Update omnibus objection to Section 507(a)(4) claims exceeding statutory cap to comply with local rules;	.20	410.00	82.00
9/20/24	BNB	Update omnibus objection to Section 507(a)(7) claims to comply with local rules;	.10	410.00	41.00
9/20/24	BNB	Update objection in support of duplicative claims objection to comply with local rules;	.10	410.00	41.00
9/20/24	BNB	Final review of duplicate claims objection;	.30	410.00	123.00

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Date	Atty	Description	Hours	Rate	Amount
9/20/24	BNB	Review final non-employee claim objection to approve filing;	.30	410.00	123.00
9/20/24	BNB	Written correspondence with D. Edward Hays re: duplicate claim omnibus objection;	.10	410.00	41.00
9/20/24	BNB	Telephone conference with Layla Buchanan re: service of omnibus claim objection to duplicative claims on Affirma;	.10	410.00	41.00
9/20/24	ANM	Drafting objections to 70 improperly designated administrative claims;	1.90	500.00	950.00
9/20/24	ANM	Drafting objections to 70 improperly designated administrative claims;	2.90	500.00	1,450.00
9/20/24	AEd	Review and revise omnibus administrative claims objection;	2.40	610.00	1,464.00
9/20/24	AEd	Telephone conferences with Alina Malymuk re: administrative claims objection;	.90	610.00	549.00
9/20/24	AEd	Telephone conferences with D. Edward Hays re: claim objections;	.20	610.00	122.00
9/20/24	AEd	Telephone conference with Bradford N. Barnhardt re: priority claim objections;	.20	610.00	122.00
9/20/24	AEd	Telephone conference with Bradford N. Barnhardt re: D. Edward Hays's review of omnibus claim objections and final revisions;	.10	610.00	61.00
9/20/24	AEd	Telephone conferences (multiple) with Layla Buchanan re: claim objections;	.50	610.00	305.00
9/20/24	AEd	Review written correspondence from Ron Brown re: SDCO admin claim and review and draft written response;	.20	610.00	122.00
9/20/24	AEd	Review objection to 507(a)(7) Priority Claims prior to filing;	.20	610.00	122.00
9/20/24	AEd	Conduct final review of Objection to 507(a)(4) claims Exceeding Statutory Cap and draft written correspondence to Layla Buchanan re: same;	.10	610.00	61.00
9/20/24	AEd	Draft written correspondence to Richard A. Marshack re: objection to Esquivel claims and declaration in support and review response;	.20	610.00	122.00
9/20/24	AEd	Final review of duplicative claim objection;	.10	610.00	61.00
9/20/24	AEd	Review written correspondence from Layla Buchanan re: priority claim objections and omnibus objections to claims (multiple) and respond;	.30	610.00	183.00
9/20/24	AEd	Review written correspondence from Alina N. Mamlyuk re: stipulation with Melissa Wilkes;	.20	610.00	122.00
9/20/24	AEd	Review final draft of Objection to Section 507(a)(4) Claims prior to filing;	.20	610.00	122.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/20/24	SMP	Review and revise judicial notice in support of omnibus objection to claims improperly designated as administrative claims (1.30);	1.30	340.00	442.00
9/20/24	SMP	Review and revise omnibus objection to duplicative proofs of claims; review claims and prepare exhibits in support of omnibus objection to duplicative proofs of claims;	2.10	340.00	714.00
9/23/24	LB	Review claims for omnibus objection to claims exceeding statutory cap Section 507(a)(4), claims of non-employees 507(a)(4), and alleged Section 507(a)(7) priority claims;	.90	340.00	306.00
9/23/24	LB	Review claims related to objection to duplicate claims;	.40	340.00	136.00
9/23/24	AEd	Draft written correspondence to Bradford N. Barnhardt re: claim objections and request for judicial notice;	.10	610.00	61.00
9/23/24	SMP	Review claims and prepare exhibits in support of omnibus objection to duplicative claims;	2.50	340.00	850.00
Sub-Total Fees:			202.10		\$ 105,140.00

7 Fee/Employment Applications

Date	Atty	Description	Hours	Rate	Amount
8/01/24	LM	Review and revise fee application;	8.00	540.00	4,320.00
8/01/24	BNB	Written correspondence with accounting re: submission of July time;	.10	410.00	41.00
8/01/24	DND	Telephone conference with Laila Masud re: subcategories for claims - administrative, secured, avoidance actions;	.20	360.00	72.00
8/02/24	LM	Review and revise first interim application for fees and costs;	1.50	540.00	810.00
8/02/24	LM	Written correspondences (x4) with Christopher Celentino, Richard A. Marshack, Nancy Rapoport re: fee examiner stipulation (.20); Telephone conference with Richard A. Marshack re: same (.10); Telephone conference with Nancy Rapoport re: same (.10); Telephone conference with Richard A. Marshack re: same (.10);	.50	540.00	270.00
8/02/24	DND	Review e-mail correspondence from accounting re: subcategories for avoidance actions;	.10	360.00	36.00
8/05/24	DEH	Telephone conference with Laila Masud re: fee application (.20); Telephone conference with accounting re: same (.10);	.30	740.00	222.00
8/05/24	CM	Telephone conference with accounting re: final invoice and chart in support of interim fee application;	.10	340.00	34.00

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Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
8/05/24	CVH	Review, analyze, and highlight billing entries to adhere to Trustee guidelines and to prepare to draft summary (.60); Draft and revise summary for fee application (.50); E-mails with Laila Masud re: same (.20);	1.30	600.00	780.00
8/05/24	LM	Telephone conference with D. Edward Hays re: status of fee application (.10); Telephone conference with accounting clerk re: same (.10); Telephone conference with accounts payable manager re: same (.10); Written correspondence with Chad V. Haes re: summary for fee application re: avoidance actions (.10); Written correspondence with Kristine Thagard and Bradford N. Barnhardt re: same (.10); Written correspondences with accounting department re: further revisions to category 15 (.20);	.70	540.00	378.00
8/05/24	LM	Draft, revise and supplement first interim application for fees and costs;	3.40	540.00	1,836.00
8/06/24	LM	Conference with accounting department re: fee application status (.20); Conference with Cynthia Bastida re: filing of same (.10);	.30	540.00	162.00
8/06/24	LM	Review and revise first interim application for fees and costs (2.90); Draft written correspondence to D. Edward Hays re: same (.10); Telephone conference with D. Edward Hays re: same (.10);	3.10	540.00	1,674.00
8/06/24	BNB	Written correspondence with Laila Masud, Kristine A. Thagard, and Chad V. Haes re: description of services for Marshack Hays Wood fee application;	.10	410.00	41.00
8/07/24	DEH	Written correspondence with Richard A. Marshack re: application to appoint fee examiner;	.30	740.00	222.00
8/07/24	DEH	Telephone conference with Laila Masud re: first interim fee application;	.20	740.00	148.00
8/07/24	DEH	Review entered order as modified by court appointing fee examiner (.20); Telephone conference with Richard A. Marshack re: same (.10);	.30	740.00	222.00
8/07/24	DEH	Review, revise, and supplement first interim fee application;	2.80	740.00	2,072.00
8/07/24	DEH	Telephone conference with Laila Masud re: fee application (.20); Written correspondence with Pam Kraus re: same and procedures after appointment of fee examiner (.20);	.40	740.00	296.00
8/07/24	DAW	Conference with Trustee re: Committee refusing to agree to the fee examiner;	.20	610.00	122.00
8/07/24	LM	Telephone conference with D. Edward Hays re: status of application for fees and costs and review of same and considerations on same;	.10	540.00	54.00
8/08/24	DEH	Written correspondence with Richard A. Marshack, Christopher Celentino, Yosina Lissebeck and Nancy Rapoport re: fee applications and Trustee compensation;	.20	740.00	148.00

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Date	Atty	Description	Hours	Rate	Amount
8/08/24	DEH	Telephone conference with Laila Masud and Pam Kraus re: firm and Trustee fee applications and pre-filing review by fee examiner (.40); Telephone conference with Richard A. Marshack, Laila Masud, and Pam Kraus re: same (.60);	1.00	740.00	740.00
8/08/24	CM	Revise and finalize first interim application for allowance of fees and costs filed by Marshack Hays Wood LLP as general counsel; memorandum of points and authorities; and declaration of D. Edward Hays in support (2.10); Draft e-mail to Laila Masud, D. Edward Hays, Layla Buchanan, Pam Kraus and accounting re: same (.10);	2.20	340.00	748.00
8/08/24	LM	Telephone conference with D. Edward Hays and Pam Kraus re: fee applications content and billing and interplay of sections 330 and 326 (.50); Telephone conference with Pam Kraus re: same and fee examiner review (.20); Review and revise first interim application for fees and costs (.20); Telephone conference with Richard A. Marshack and Pam Kraus re: same (.10); Telephone conference with Richard A. Marshack, Pam Kraus and D. Edward Hays re: same (.80); Written correspondences (x3) with billing team re: finalization of same (.20);	2.00	540.00	1,080.00
8/08/24	LM	Review written correspondences (x5) from Nancy Rapoport re: fee examination protocol and correspondences between Richard A. Marshack, D. Edward Hays and other professionals re: same (.20); Draft written correspondence to Aaron E. de Leest re: 330a3 and 326 interplay and research on same (.10);	.30	540.00	162.00
8/08/24	LM	Telephone conference with accounting department re: LEDES file and fee examiner requests;	.30	540.00	162.00
8/08/24	LM	Telephone conference with Aaron E. de Leest re: interplay of 330a3 and 326 and history of interactions with same for first interim application for fees and costs of chapter 11 Trustee;	.20	540.00	108.00
8/08/24	LM	Telephone conference with Bradford N. Barnhardt re: Law360 article and fee applications (No Charge);	.10	540.00	N/C
8/08/24	LM	Written correspondence with Nancy Rapoport re: fee examination (.20); Written correspondence with Richard A. Marshack re: same (.20); Written correspondence with D. Edward Hays re: same (.20); Telephone conference with accounting department re: costs (.20); Written correspondence with D. Edward Hays re: same (.10);	.90	540.00	486.00
8/08/24	BNB	Telephone conference with Laila Masud re: Law360 article and fee applications (No Charge);	.10	410.00	N/C
8/08/24	AEd	Telephone conference with with Laila Masud re: interplay of 330(a)(3) and 326 and Trustee's first interim fee application as chapter 11 Trustee;	.20	610.00	122.00
8/08/24	AEd	Review written correspondence from Laila Masud re: Interplay of 330a3 and 326 for Chapter 11 Trustee Fees and research re: same and draft written correspondence in response;	1.40	610.00	854.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

Date	Atty	Description	Hours	Rate	Amount
8/14/24	LM	Telephone conference with D. Edward Hays re: examiner report status (.10); Draft written correspondence to Nancy Rapoport and team re: same (.10); Review written correspondence from Pam Kraus re: interim report by chapter 7 Trustee re: compensation (.10);	.30	540.00	162.00
8/15/24	LM	Review written correspondence from Joseph Tiano re: legaldecoders report status;	.10	540.00	54.00
8/15/24	LM	Draft, revise and supplement Trustee interim report and fee application;	.80	540.00	432.00
8/16/24	DEH	Written correspondence with Paul Deutch and Kim Steverson of Omni re: interim fee application;	.20	740.00	148.00
8/16/24	LM	Review written correspondence from Pam Kraus re: chart and costs for Trustee interim report and application;	.20	540.00	108.00
8/16/24	AEd	Review 327(a) and research re: disinterestedness and draft supplemental disclosure for Marshack Hays Employment Application;	1.60	610.00	976.00
8/19/24	DEH	Review and revise supplemental disclosure re: Aaron E. de Leest (.30); Written correspondence with Aaron E. de Leest re: same (.10);	.40	740.00	296.00
8/19/24	DEH	Telephone conference with Aaron E. de Leest re: 2014 disclosure and Blue Cross priority claim and response to Blue Cross objection to plan;	.60	740.00	444.00
8/19/24	LB	Review and revise fee application (.20); Conference with Laila Masud re: same (.10);	.30	340.00	102.00
8/19/24	DAW	Review and analyze multiple e-mail correspondence from D. Edward Hays and Aaron E. de Leest re: the supplement to the application to employ;	.20	610.00	122.00
8/19/24	DAW	Further conference with the Trustee re: fee examiner and ongoing negotiations (No Charge);	.20	610.00	N/C
8/20/24	DEH	Revise and finalize supplemental disclosure re: Aaron E. de Leest joining firm (.10); Written correspondence with Richard A. Marshack and David A. Wood re: same and whether to file or set for hearing (.10);	.20	740.00	148.00
8/28/24	SRH	Conference with Laila Masud re: broker commission for sale of law practice (No Charge);	.10	390.00	N/C
8/29/24	LM	Telephone conferences (x2) with Alina N. Mamlyuk re: billing inquiries by fee examiner (.20); Telephone conference with Devan De Los Reyes re: same (.10); Telephone conference with Bradford N. Barnhardt re: same (.10); (No Charge)	.40	540.00	N/C

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
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Date	Atty	Description	Hours	Rate	Amount
8/29/24	LM	Telephone conference with Richard A. Marshack re: fee examiner results and inquiries and responses to same (.30); Written correspondence with Layla Buchanan re: sending same to Trustee for response (.10); (No Charge)	.40	540.00	N/C
8/29/24	LM	Telephone conference with Richard A. Marshack and Pam Kraus re: fee examiner reports for professionals and inquiries (.40); Telephone conference with Pam Kraus re: same (.20); (No Charge)	.60	540.00	N/C
8/29/24	LM	Revise and finalize Trustee application for compensation and reimbursement of costs;	3.60	540.00	1,944.00
8/29/24	BNB	Telephone conference with Laila Masud re: information needed to respond to fee examiner's inquires on billing entries (No Charge);	.10	410.00	N/C
8/29/24	BNB	Written correspondence with Laila Masud re: responses to fee examiner's requests for more information (No Charge);	.60	410.00	N/C
8/29/24	DND	Telephone conference with Laila Masud re: providing explanation for certain billing entries (.10); Review of excel sheet with certain billing entries and provide explanation to same (.50); (No Charge)	.60	360.00	N/C
8/30/24	DEH	Telephone conference with Laila Masud re: fee examiner's report and requests for further information or clarifications (No Charge);	.40	740.00	N/C
8/30/24	LM	Telephone conference with Alina N. Mamlyuk re: fee examiner inquiry responses (No Charge);	.10	540.00	N/C
8/30/24	LM	Written correspondence with Joshua Teeple and Dimple Mehra re: fees of grobstein teeple and inquiries by examiner (No Charge);	.10	540.00	N/C
8/30/24	LM	Telephone conference with Dimple Mehra re: fee examiner inquiries (.40); Written correspondence with Dimple Mehra and Joshua Teeple re: same (.10); (No Charge)	.50	540.00	N/C
8/30/24	LM	Telephone conference with Richard A. Marshack re: fee examiner inquiries and responses to same (.20); Written correspondence with Pam Kraus re: same (.10); Telephone conference with D. Edward Hays re: same (.50); Written correspondence with Alina N. Mamlyuk re: same (.10); (No Charge)	.90	540.00	N/C
8/30/24	LM	Telephone conference with Nancy Rapoport re: fees examination (No Charge);	1.00	540.00	N/C
8/30/24	LM	Review and analyze fee examiner inquiries and draft responses to same (No Charge);	2.30	540.00	N/C
8/30/24	LM	Written correspondence with Pam Kraus re: fee examiner inquiries (No Charge);	.10	540.00	N/C
8/30/24	ANM	Drafted and sent two e-mail correspondences to Laila Masud re: external use of my explanations of billing entries for which the fee examiner asked (No Charge);	.10	500.00	N/C

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
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Date	Atty	Description	Hours	Rate	Amount
9/02/24	DEH	Written correspondence with Laila Masud re: fee application and providing Ledes files to Office of the United States Trustee;	.20	740.00	148.00
9/03/24	DEH	Review and revise Trustee's first interim fee application (.60); Telephone conference with Laila Masud re: same (.30); Telephone conference with Laila Masud and Pam Kraus re: same (.20);	1.10	740.00	814.00
9/03/24	DEH	Revise and finalize firm's first interim fee application;	.50	740.00	370.00
9/03/24	PK	Telephone conferences with D. Edward Hays and Laila Masud re: first interim fee application (.30); Revise fee application (.80); Gather, organize and bates stamp exhibits (.40); E-mails with all professionals re: fees and costs to be included in joint notice of hearing (.30); Draft and revise notice of hearing (.90);	2.70	340.00	918.00
9/03/24	LM	Telephone conference with Dimple Mehra re: LEDES file to U.S. Trustee and status of filing of application and responses to fee examiner (.20); Written correspondences (x2) with Dimple Mehra re: same (.20); Written correspondence with U.S. Trustee re: omni ledes file (.10); Telephone conference with Pam Kraus re: same (.10); Telephone conference with Pam Kraus re: filing of fee applications and notice of same for 10 plus professionals (.20);	.80	540.00	432.00
9/03/24	LM	Written correspondences with D. Edward Hays re: status of final review of fee applications;	.20	540.00	108.00
9/03/24	LM	Conferences (x2) with accounting department re: billing finalization;	.20	540.00	108.00
9/03/24	LM	Telephone conference with Cynthia Bastida re: fee application filings;	.40	540.00	216.00
9/03/24	LM	Revise and finalize Trustee fee application (.50); Written correspondence with D. Edward Hays re: same (.20); Telephone conference with Pam Kraus re: same (.10); Telephone conference with D. Edward Hays re: same (.70);	1.50	540.00	810.00
9/03/24	LM	Conference with staff re: Bicher and Associates fee examination inquiries (.20); Telephone conferences (x2) with Lori Ensley re: same (.30); Draft, revise and supplement responses to inquiries posed by fee examiner (1.90); Draft written correspondence to Nancy Rapoport re: same (.10); (No Charge)	2.50	540.00	N/C
9/03/24	LM	Draft responses to inquiries by fee examiner for Marshack Hays Wood LLP bill (No Charge);	1.00	540.00	N/C
9/03/24	LM	Telephone conference with Pam Kraus re: notice of fee applications and status of finalization of legal authority on applications for Trustee and firm (.50); Conference with accounting clerk re: same and charts (.20); Written correspondence with accounting manger re: same and LEDES file for U.S. Trustee (.10); Written correspondence with U.S. Trustee re: LEDES file for firm (.10);	.90	540.00	486.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

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Date	Atty	Description	Hours	Rate	Amount
9/04/24	DEH	Telephone conference with Richard A. Marshack re: filed fee applications and U.S. Trustee's request for Trustee's Ledes files;	.20	740.00	148.00
9/04/24	DEH	Telephone conference with Richard A. Marshack re: reasons for excluding Trustee's billing entries from fee application;	.30	740.00	222.00
9/04/24	LM	Written correspondence with Jaimee at U.S. Trustee office re: LEDES file for Trustee (.10); Written correspondence with D. Edward Hays re: same (.10);	.20	540.00	108.00
9/05/24	LM	Telephone conference with Richard A. Marshack re: U.S. Trustee inquiries re: fees and requests for discounts/reductions;	.20	540.00	108.00
9/05/24	AEd	Review written correspondence from D. Edward Hays re: Khang & Khang LLP final fee application;	.10	610.00	61.00
9/06/24	DEH	Telephone conference with Laila Masud re: responses to inquiries raised by fee examiner;	.20	740.00	148.00
9/06/24	DEH	Review entered order clarifying scope of fee examiner's duties;	.10	740.00	74.00
9/06/24	DAW	Review and analyze multiple e-mail correspondence from the collective re: the pending fee applications and strategy thereto;	.20	610.00	122.00
9/06/24	LM	Telephone conference with D. Edward Hays re: status of response to fee examiner (.10); Draft, revise and finalize responses to fee examiner inquiries for Trustee (3.60); Draft, revise and finalize response to fee examiner inquiries for Marshack Hays Wood LLP (.60); (No Charge)	4.30	540.00	N/C
9/07/24	DEH	Written correspondence with Nancy Rapoport re: conclusions of review of firm and Trustee fee applications (No Charge);	.20	740.00	N/C
9/07/24	DEH	Written correspondence with Richard A. Marshack, Christopher Celentino, and Yosina Lissebeck re: committee's request to continue hearings on fee applications;	.20	740.00	148.00
9/08/24	DEH	Written correspondence with Richard A. Marshack, Christopher Celentino, and Pam Kraus re: producing Trustee's time records to committee counsel in unredacted form;	.20	740.00	148.00
9/09/24	DEH	Written correspondence with Richard A. Marshack and Christopher Celentino re: fee application language for declarations (.20); Review and analyze Christopher Celentino's draft declaration (.10);	.30	740.00	222.00
9/09/24	DEH	Telephone conference with Richard A. Marshack re: final examiner reports, U.S. Trustee requests for reductions or holdbacks, and timing of final fee applications;	.50	740.00	370.00
9/09/24	DAW	Conference with Trustee re: strategy for first interim fee application;	.30	610.00	183.00
9/09/24	LM	Telephone conference with Richard A. Marshack re: Trustee review of fee applications and declaration comments;	.10	540.00	54.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/10/24	LM	Telephone conference with D. Edward Hays re: bicher and associates fee examiner inquiries (.10); Telephone conference with Richard A. Marshack re: same (.10); Written correspondence with Nancy Rapoport re: same (.10); Written correspondence with Pam Kraus re: same (.10); (No Charge)	.40	540.00	N/C
9/10/24	LM	Written correspondences (x10) with D. Edward Hays and Pam Kraus re: committee extension of deadline to review fee applications of Trustee professionals;	.30	540.00	162.00
9/10/24	LM	Telephone conference with Richard A. Marshack re: market rates for bankruptcy professionals (.10); Written correspondence with Kathleen Frederick re: same (.10); Written correspondence with Kathleen Frederick and Richard A. Marshack re: results of same (.10);	.30	540.00	162.00
9/10/24	LM	Telephone conference with D. Edward Hays re: opposition to Khaang and Khang fee application (.10); Telephone conference with Layla Buchanan re: same (.10); Review and analyze same (.20); Draft, revise and supplement opposition to same (1.90); Written correspondences with Layla Buchanan and D. Edward Hays re: filing of same (1.0) correspondence from Keith Owens re: joinder by committee (.10);	3.40	540.00	1,836.00
9/10/24	LM	Written correspondence with fee examiner re: filing of final report;	.20	540.00	108.00
9/11/24	LM	Written correspondences with Richard A. Marshack re: declaration and supporting fees of professionals (.10); Written correspondences (x6) with Nancy Rapoport, Richard A. Marshack and Pam Kraus re: professional fees and response to new inquiry and final report (.40); Written correspondences (x) with Pam Kraus re: same (.10);	.60	540.00	324.00
9/11/24	LM	Review written correspondences (x8) from Pam Kraus, D. Edward Hays and Office of the United States Trustee re: In re: Stewart and Nancy Rapoport re: status of examiner reports and extensions to review/response;	.30	540.00	162.00
9/12/24	DAW	Review and analyze multiple e-mail correspondence from the Trustee re: comments on the fee applications;	.20	610.00	122.00
9/12/24	DAW	Review and analyze the Examiner's report (No Charge);	.40	610.00	N/C
9/12/24	BNB	Review e-mail from Aaron E. de Leest re: drafting motion to extend monitor;	.10	410.00	41.00
9/16/24	LM	Review and analyze Fox Rothschild application for fees and costs re: reasonableness under Section 330(a)(3) with draft of preliminary analysis to Richard A. Marshack and D. Edward Hays (1.30); Telephone conference with D. Edward Hays re: same (.10);	1.40	540.00	756.00
9/18/24	DEH	Telephone conference with Laila Masud re: K&K oral argument scope and prior hearing on employment application including prior ruling and review of transcripts;	.50	740.00	370.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
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Date	Atty	Description	Hours	Rate	Amount
9/18/24	DAW	Review and analyze the Fee Examiner's supplement to the fee report (No Charge);	.40	610.00	N/C
9/18/24	LM	Review and analyze reply filed by Joon Khang in support of first and final fee application of K&K (.10); Written correspondence with D. Edward Hays re: content of same (.10); Draft written correspondence to Queenie Ng and Marilyn Sorenson re: benefit provided in preparation of seven day package and 341 (.10);	.30	540.00	162.00
9/18/24	LM	Telephone conference with D. Edward Hays re: K&K oral argument scope and prior hearing on employment application including prior ruling and review of transcripts;	.50	540.00	270.00
9/18/24	LM	Written correspondences (x5) with Queenie Ng and Marilyn Sorenson re: Khang & Khang fee application;	.20	540.00	108.00
9/21/24	DAW	Review and analyze the Court's tentative on the interim fee applications (.20); Review and respond to multiple correspondence from Trustee and D. Edward Hays re: same (.20);	.40	610.00	244.00
9/23/24	DEH	Telephone conference with Richard A. Marshack and Christopher Celentino re: extending monitor's appointment, tentative rulings on fee applications, call from Office of the United States Trustee that voluntary reductions not referenced in tentatives, and response to Rule 2004 examinations;	.50	740.00	370.00
9/23/24	DEH	Telephone conference with Laila Masud re: proposed order granting interim fee applications;	.20	740.00	148.00
9/23/24	DAW	Multiple conferences with Trustee re: tentative ruling on the fee apps and need to prepare our second and final per the terms of the Plan in the immediate future;	.30	610.00	183.00
9/23/24	LM	Telephone conference with D. Edward Hays and Richard A. Marshack re: revisions to fee order;	.20	540.00	108.00
9/23/24	LM	Telephone conference with Richard A. Marshack re: fee order draft (.10); Telephone conference with Pam Kraus re: same (.10); Draft, revise and supplement fee order with review of applications and tentative and notices for accuracy, declarations and fee examiner reports to ensure deals are accounted for (3.40); Written correspondence with D. Edward Hays, Pam Kraus and Richard A. Marshack re: same and revisions (.20); Make further revisions (.50);	4.30	540.00	2,322.00
9/23/24	BNB	Telephone conference with Aaron E. de Leest re: holding off on drafting motion to extend monitor;	.10	410.00	41.00
9/23/24	BNB	Written correspondence with D. Edward Hays re: drafting motion to extend monitor;	.30	410.00	123.00
9/23/24	AEd	Review written correspondence re: fee order from Richard A. Marshack, Laila Masud and Christopher Celentino;	.10	610.00	61.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
Sub-Total Fees:			85.40		\$ 38,067.00

8 Fee/Employment Objections

Date	Atty	Description	Hours	Rate	Amount
8/20/24	DAW	Review and analyze supplemental disclosure by Marshack Hays re: the retention of Aaron E. de Leest (.20); Review and respond to e-mail correspondence from Trustee and D. Edward Hays re: same (.10); (No Charge)	.30	610.00	N/C
8/20/24	DAW	Review and respond to multiple further e-mail correspondence from Layla Buchanan, Trustee, and D. Edward Hays re: revisions to the supplemental disclosure (No Charge);	.20	610.00	N/C
8/20/24	LM	Telephone conference with Bradford N. Barnhardt re: admin professionals fees (.10); Telephone conference with D. Edward Hays re: same (.10); Written correspondence Bradford N. Barnhardt re: same (.10); (No Charge)	.30	540.00	N/C
8/22/24	DEH	Written correspondence with Aaron E. de Leest re: supplemental Rule 2014 statement (No Charge);	.20	740.00	N/C
8/22/24	DEH	Telephone conference with Laila Masud re: fee examiner review (No Charge);	.20	740.00	N/C
8/22/24	DEH	Written correspondence with Aaron E. de Leest re: consent of MLG that no conflict and revising disclosure re: same (No Charge);	.20	740.00	N/C
8/23/24	LM	Review and revise first interim Trustee application for fees and costs (No Charge);	3.90	540.00	N/C
8/26/24	DEH	Telephone conference with Laila Masud re: fee application, statement of disinterestedness, and other related issues (No Charge);	.40	740.00	N/C
8/26/24	LB	Review and finalize supplement to Statement of Disinterestedness re: Employment Application (No Charge);	.20	340.00	N/C
8/26/24	LM	Telephone conference with D. Edward Hays re: fee application, statement of disinterestedness and other considers (.40); Written correspondences (x4) with Nancy Raport and Legalcoders team re: same (.20); (No Charge)	.60	540.00	N/C
8/26/24	LM	Draft, revise and supplement Trustee interim report re: standards for compensation under chapter 11 and varying court views on same (No Charge);	5.60	540.00	N/C

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

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Date	Atty	Description	Hours	Rate	Amount
8/26/24	AEd	Draft written correspondence to Layla Buchanan re: supplement to statement of disinterestedness and review written response (No Charge);	.40	610.00	N/C
8/27/24	DEH	Telephone conference with Laila Masud re: results of findings by Legaldecoders and next steps/timeline (No Charge);	.20	740.00	N/C
8/27/24	LM	Telephone conference with D. Edward Hays re: results of findings by legaldecoders and next steps/timeline (No Charge);	.20	540.00	N/C
8/27/24	LM	Conference with Joseph Tiano re: legaldecoders and preliminary general analysis and trends on interim applications for compensation (1.10); Written correspondence with Joseph Tiano re: same (.10); (No Charge)	1.20	540.00	N/C
8/27/24	LM	Conference with Bradford N. Barnhardt re: LBR 2016-1 provision allowing factual narrative to be incorporated in fee application (No Charge);	.10	540.00	N/C
8/27/24	LM	Draft, revise and supplement Trustee fee application (No Charge);	2.80	540.00	N/C
8/27/24	LM	Draft, revise and supplement Trustee fee application (No Charge);	.50	540.00	N/C
8/27/24	BNB	Conference with Laila Masud re: LBR 2016-1 provision allowing factual narrative to be incorporated in fee application (No Charge);	.10	410.00	N/C
8/28/24	LM	Telephone conference with Pam Kraus re: Trustee interim report and compensation status (No Charge);	.20	540.00	N/C
8/28/24	LM	Research, draft, revise and supplement legal authority on chapter 11 Trustee fees (2.20); Conference with Aaron E. de Leest re: same (.20); Conference with Sarah R. Hasselberger and staff (Trustee administrator re: same (.20); (No Charge)	2.60	540.00	N/C
8/30/24	ANM	In response to request by Laila Masud, drafted a 13-page response to 57 questions made by the fee examiner re: entries submitted in the fee application for the examiner's review to clarify and explain entries that may have been unclear or ambiguous (No Charge);	2.30	500.00	N/C
9/05/24	DEH	Telephone conference with Richard A. Marshack and Yosina Lissebeck re: discussions with Office of the United States Trustee re: fee applications;	.30	740.00	222.00
9/05/24	DEH	Written correspondence with Richard A. Marshack, Christopher Celentino, and Yosina Lissebeck re: response to debtor's former counsel's fee application;	.20	740.00	148.00
9/05/24	DEH	Telephone conference with Laila Masud re: drafting response to debtor's former counsel's final fee application;	.20	740.00	148.00
9/08/24	DEH	Written correspondence with Nick and Keith Owens re: request for extension of time to file responses to fee applications;	.30	740.00	222.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/08/24	DEH	Written correspondence with Richard A. Marshack, Nancy Rapoport, and Christopher Celentino re: examiner reports (No Charge);	.20	740.00	N/C
9/08/24	DEH	Written correspondence with Richard A. Marshack, Laila Masud, and Aaron E. de Leest re: response to Khang fee application (.20); Written correspondence with Nick Koffroth and Keith Owens re: same (.10);	.30	740.00	222.00
9/08/24	DEH	Written correspondence with Richard A. Marshack and Christopher Celentino re: Trustee's review and position on all pending fee applications;	.20	740.00	148.00
9/09/24	DEH	Telephone conferences with Richard A. Marshack re: review of and responses to fee applications;	.40	740.00	296.00
9/09/24	DEH	Written correspondence with Nick Koffroth and Keith Owens re: draft stipulation and review and revise same;	.20	740.00	148.00
9/10/24	DEH	Review and revise Trustee's response to debtor's former counsel's final fee application (.60); Written correspondence with Laila Masud re: same (.10); Written correspondence with Nick Koffroth re: same (.20);	.90	740.00	666.00
9/10/24	DEH	Telephone conference with Laila Masud re: opposition to debtor's former counsel's fee application;	.20	740.00	148.00
9/10/24	DEH	Telephone conference with Richard A. Marshack re: Trustee's review of pending fee applications;	.30	740.00	222.00
9/10/24	DEH	Telephone conference with Richard A. Marshack re: examiner findings, committee's request for stipulation to extend time to respond, and opposition to debtor's former counsel's fees;	.30	740.00	222.00
9/10/24	DEH	Telephone conference with Richard A. Marshack and Pam Kraus re: authority that interim compensation to Trustee may be based on receipts and not disbursements (.20); Research re: same and read and analyze In re: Stewart (.30); Written correspondence with Richard A. Marshack and Pam Kraus re: same (.10);	.60	740.00	444.00
9/10/24	DEH	Telephone conference with Queenie Ng and Richard A. Marshack re: reductions requested by U.S. Trustee;	.20	740.00	148.00
9/10/24	DEH	Telephone conference with Richard A. Marshack re: committee's requested extension and Trustee's need for extension of time to complete review of committee counsel's fees (.20); Telephone conference with Nick Koffroth re: same (.10);	.30	740.00	222.00
9/10/24	DEH	Written correspondence with Nick Koffroth and review and revise stipulation to extend committee's time to respond to fee applications (.30); Written correspondence with Richard A. Marshack, Laila Masud, and Pam Kraus re: same (.10);	.40	740.00	296.00
9/11/24	DEH	Written correspondence with Richard A. Marshack and Christopher Celentino re: Trustee's and examiner's responses to fee applications;	.20	740.00	148.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/11/24	DEH	Telephone conference with Richard A. Marshack to prepare for call with committee counsel (.20); Conference call with Richard A. Marshack, Keith Owens, and Adam Meislik re: committee's concerns re: Dinsmore application (.90);	1.10	740.00	814.00
9/11/24	DEH	Telephone conference with Richard A. Marshack and Christopher Celentino re: committee's concerns with Dinsmore application;	.40	740.00	296.00
9/11/24	DEH	Telephone conferences with Richard A. Marshack, Queenie Ng, and Pam Kraus re: responses to fee applications;	1.10	740.00	814.00
9/11/24	DEH	Telephone conference with Richard A. Marshack re: Trustee's response to applications;	.30	740.00	222.00
9/11/24	DEH	Written correspondence with Nick Koffroth and Richard A. Marshack re: stipulation to extend time to respond to fee applications;	.20	740.00	148.00
9/11/24	DEH	Review and analyze Stewart case (.20); Written correspondence with Queenie Ng, Richard A. Marshack, and Pam Kraus re: same and Trustee's interim compensation (.30);	.50	740.00	370.00
9/11/24	DEH	Draft stipulation extending Trustee's time to respond to committee's fee applications (.30); Written correspondence with Queenie Ng re: same (.10);	.40	740.00	296.00
9/12/24	DEH	Review and analyze new decision re: calculation of Chapter 11 Trustee compensation (.30); Written correspondence with Richard A. Marshack, Laila Masud, and Pam Kraus re: same (.20); Telephone conference with Richard A. Marshack and Pam Kraus re: same (.20);	.70	740.00	518.00
9/12/24	DEH	Telephone conference with Richard A. Marshack re: Trustee's responses to applications and stipulation by retained professionals to provide time assisting state and federal agencies at no cost to estate;	.30	740.00	222.00
9/12/24	DEH	Written correspondence with Keith Owens re: stipulation and responses fee applications;	.20	740.00	148.00
9/12/24	DAW	Conference with Trustee re: ongoing fee negotiations with the Committee;	.30	610.00	183.00
9/12/24	DAW	Multiple further conferences with Trustee re: Committee's angst with Dinsmore's fees;	.20	610.00	122.00
9/13/24	DEH	Telephone conferences with Richard A. Marshack re: potential objections to committee's fees re: amount incurred in furtherance of the plan and status of negotiations between committee and Dinsmore re: special counsel's fees;	.40	740.00	296.00
9/13/24	DEH	Written correspondence with Richard A. Marshack and Laila Masud re: potential objections to committee counsel's fees;	.20	740.00	148.00
9/13/24	DEH	Written correspondence with Richard A. Marshack and Christopher Celentino re: negotiations (No Charge);	.20	740.00	N/C

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
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Date	Atty	Description	Hours	Rate	Amount
9/13/24	DAW	Multiple conferences with Trustee re: Committee's issues with Dinsmore's fees;	.40	610.00	244.00
9/16/24	DEH	Telephone conference with Laila Masud re: analysis and assessment of committee counsel's fees;	.20	740.00	148.00
9/16/24	DEH	Telephone conferences with Richard A. Marshack and Queenie Ng re: fee reductions and negotiations (No Charge);	.50	740.00	N/C
9/16/24	DEH	Telephone conference with Richard A. Marshack and Queenie Ng re: responses to fee applications (No Charge);	.50	740.00	N/C
9/16/24	DEH	Telephone conference with Richard A. Marshack re: committee counsel fees;	.20	740.00	148.00
9/16/24	DEH	Review written correspondence from Laila Masud and review analysis of issues in committee counsel's fee requests;	.40	740.00	296.00
9/17/24	DEH	Review and execute stipulation re: committee's agreement re: Dinsmore's fees and written correspondence with Nick Koffroth, Christopher Celentino, and Richard A. Marshack re: same;	.30	740.00	222.00
9/17/24	DEH	Review and revise Trustee's comments to fee applications (.20); Telephone conference with Richard A. Marshack and Pam Kraus re: same (.20);	.40	740.00	296.00
9/18/24	DEH	Written correspondence with Laila Masud re: response to K&K final fee application;	.10	740.00	74.00
9/18/24	DAW	Review and analyze the stipulation between the Committee and Dinsmore re: reduction of fees, the holdback, and the holdback trigger;	.30	610.00	183.00
9/18/24	DAW	Review and analyze Debtor's counsel replies to the Trustee and the Committee's objection;	.40	610.00	244.00
Sub-Total Fees:			38.60		\$ 10,522.00

TOTAL FEES

\$ 340,416.00

EXHIBIT 4

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

FEE RECAP BY TASK CODE

Task	Description	Hours	Amount
.2	OHP Adversary Action (23-01098)	.80	592.00
.3	Marshack v. Diab (23-01046)	3.60	2,317.00
.4	Han Trinh (24-02077)	1.40	681.00
.5	Jayde Trinh (24-02243)	.50	186.00
.6	Greyson (24-02074)	2.50	406.00
1	Asset Analysis and Recovery	10.70	5,275.00
10	Litigation	56.30	34,736.00
12	Plan and Disclosure Statement	85.60	53,133.00
14	523/727 Litigation	.10	41.00
15	Avoidance Actions	61.50	31,585.00
15.1	Bill.com	7.50	4,142.00
15.10	EnergyCare LLC	1.50	854.00
15.11	Jaclyn Noe	.80	480.00
15.2	White collar	.30	180.00
15.4	Paronich Law Firm	1.30	822.00
15.5	Master Builders of America	5.00	2,784.00
15.6	Kindlund Legal LLC	.70	348.00
15.7	Finlays HR	1.10	636.00
15.8	Derrick Landry	.90	516.00
15.9	Oppenheim Group	.80	432.00
16	Administrative Claims	29.90	14,263.00
17	Secured Claims	5.00	2,059.00
3	Business Operations	7.40	3,214.00
4	Case Administration	45.70	27,005.00
5	Claims Administration and Objections	202.10	105,140.00
7	Fee/Employment Applications	85.40	38,067.00
8	Fee/Employment Objections	38.60	10,522.00
	Sub-Total of Fees:	657.00	\$ 340,416.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

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FEE RECAP BY ATTORNEY

Name	Atty	Staff Level	N/C Hours	Billed Hours	Rate	Billed Amount
Sarah R. Hasselberger	SRH	Associate	.10	.00	.00	.00
Kathleen Frederick	KF	Paralegal	.00	3.90	290.00	1,131.00
Pamela Kraus	PK	Paralegal	.00	2.70	340.00	918.00
Chanel Mendoza	CM	Paralegal	.00	2.90	340.00	986.00
Layla Buchanan	LB	Paralegal	.20	32.20	340.00	10,948.00
Cynthia Bastida	CB	Paralegal	.00	2.00	340.00	680.00
Pineda, Sandra M	SMP	Paralegal	.00	15.20	340.00	5,168.00
Devan N. de los Reyes	DND	Law Clerk	2.80	28.60	360.00	10,296.00
Bradford N. Barnhardt	BNB	Associate	1.30	75.00	410.00	30,750.00
Alina N. Mamlyuk	ANM	Of Counsel	2.40	43.50	500.00	21,750.00
Laila Masud	LM	Partner	32.70	46.60	540.00	25,164.00
Chad V. Haes	CVH	Partner	.40	54.00	600.00	32,400.00
David A. Wood	DAW	Partner	3.00	11.50	610.00	7,015.00
de Leest, Aaron E	AEd	Associate	1.50	166.90	610.00	101,809.00
Kristine A. Thagard	KAT	Of Counsel	.00	.70	650.00	455.00
D. Edward Hays	DEH	Partner	4.00	122.90	740.00	90,946.00
Total			48.40	608.60		\$ 340,416.00

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
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FEE RECAP BY MONTH

de Leest, Aaron E

08/2024	82.50	50,325.00
09/2024	84.40	51,484.00
Subtotal for de Leest, Aaron E	166.90	\$ 101,809.00

Pineda, Sandra M

09/2024	15.20	5,168.00
Subtotal for Pineda, Sandra M	15.20	\$ 5,168.00

D. Edward Hays

08/2024	82.80	61,272.00
09/2024	40.10	29,674.00
Subtotal for D. Edward Hays	122.90	\$ 90,946.00

David A. Wood

08/2024	5.30	3,233.00
09/2024	6.20	3,782.00
Subtotal for David A. Wood	11.50	\$ 7,015.00

Laila Masud

08/2024	28.70	15,498.00
09/2024	17.90	9,666.00
Subtotal for Laila Masud	46.60	\$ 25,164.00

Kristine A. Thagard

08/2024	.70	455.00
Subtotal for Kristine A. Thagard	.70	\$ 455.00

Chad V. Haes

08/2024	11.30	6,780.00
09/2024	42.70	25,620.00
Subtotal for Chad V. Haes	54.00	\$ 32,400.00

Alina N. Mamlyuk

08/2024	23.20	11,600.00
09/2024	20.30	10,150.00
Subtotal for Alina N. Mamlyuk	43.50	\$ 21,750.00

Devan N. de los Reyes

08/2024	13.40	4,824.00
09/2024	15.20	5,472.00
Subtotal for Devan N. de los Reyes	28.60	\$ 10,296.00

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Richard Marshack, Trustee
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Bradford N. Barnhardt

08/2024	51.80	21,238.00
09/2024	23.20	9,512.00
Subtotal for Bradford N. Barnhardt	75.00	\$ 30,750.00

Pamela Kraus

09/2024	2.70	918.00
Subtotal for Pamela Kraus	2.70	\$ 918.00

Chanel Mendoza

08/2024	2.90	986.00
Subtotal for Chanel Mendoza	2.90	\$ 986.00

Layla Buchanan

08/2024	8.50	2,890.00
09/2024	23.70	8,058.00
Subtotal for Layla Buchanan	32.20	\$ 10,948.00

Cynthia Bastida

09/2024	2.00	680.00
Subtotal for Cynthia Bastida	2.00	\$ 680.00

Kathleen Frederick

08/2024	3.90	1,131.00
Subtotal for Kathleen Frederick	3.90	\$ 1,131.00

EXHIBIT 5

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

DISBURSEMENTS

E101 Copying

Date	Description	Amount
8/16/24	Document Copies re: Chapter 11 Trustee's status report (including Judge copy)	31.50
8/19/24	Document Copies re: Trustee's motion for order approving stipulation between Trustee, Committee of Secured Creditors, and Azzure Capital, LLC for consent to use of disputed cash collateral and replacement lien, and application for order setting hearing on shortened notice re motion for order approving stipulation for consent to use of cash collateral etc. (Judge copy)	3.10
8/19/24	Document Copies re: Statement regarding cash collateral or debtor in possession financing (Judge copy)	.70
8/19/24	Document Copies re: Notice of hearing on Trustee's motion for order approving stipulation between Trustee, The Official Committee of Unsecured Creditors, and Azzure Capital, LLC for consent to use of disputed cash collateral, and replacement lien (Judge copy)	1.20
8/20/24	Document Copies re: Declaration of Layla Buchanan regarding telephonic notice of hearing on chapter 11 Trustee's motion for order approving stipulation between Trustee, the Official Committee of Unsecured Creditors, and Azzure Capital, LLC for consent to use of disputed cash collateral and replacement lien (Judge copy)	.90
8/26/24	Document Copies re: Stipulation between Trustee and Jennifer Ann McLaughlin regarding treatment of administrative claim sought by motion by Jennifer Ann McLaughlin (including Judge copy)	1.60
8/26/24	Document Copies re: Supplement to statement of disinterestedness re Trustee's counsel (MHW) (Judge copy)	1.00
8/27/24	Document Copies re: Motion to approve compromise between Trustee and Blue Cross of California dba Anthem Blue Cross, and application for order setting hearing on shortened notice on motion to approve compromise, and notice of hearing on motion to approve compromise, and declaration of Layla Buchanan regarding telephonic notice and service of notice of hearing (Judge copies)	7.20
8/27/24	Document Copies re: Letter to Golden and Bensamochan re Affirma LLC and Celso Leanos proofs of claims	5.40
8/28/24	Document Copies re: Stipulation to modify briefing schedule and to continue hearing on motion for allowance of administrative expense claim filed by Herret Credit Consultants (Judge copy)	.90
9/03/24	Document Copies re: notice of lodgment re motion to approve compromise between trustee and Blue Cross of California (judge copy)	10.00
9/03/24	Document Copies re: notice of hearing re fee application	4.20
9/04/24	Document Copies re: Notice of hearing on fee applications, and first interim application for allowance of fees and costs filed by MHW, and Chapter 11 Trustee's first interim report and application for allowance of fees and costs (Judge copies)	85.80
9/06/24	Document Copies re: Letters to investigate potential fraudulent transfers	11.60
9/11/24	Document Copies re: Hearing binder for RAM	24.60
9/17/24	Document Copies re: Appellee's statements of elections to proceed in district court on docket numbers 1645, 1647, and 1648 (Judge copies)	2.10
9/20/24	Document Copies re: Chapter 11 Trustee's omnibus objection to proofs of claim filed for alleged administrative claims	170.20
9/20/24	Document Copies re: Chapter 11 Trustee's objection to the claims filed by Olga Lucia Esquivel	8.30

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
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9/20/24	Document Copies re: Chapter 11 Trustee's omnibus objection to alleged 507a4 priority wage benefit claims filed by non-employees	2.70
9/20/24	Document Copies re: Chapter 11 Trustee's omnibus objection to duplicative priority proofs of claims	39.80
9/20/24	Document Copies re: Chapter 11 Trustee's omnibus objection to alleged 507a7 priority claims that exceed the statutory cap	117.10
9/20/24	Document Copies re: Chapter 11 Trustee's omnibus objection to alleged 507a4 priority claims that exceed statutory cap	16.20
9/23/24	Document Copies re: Omnibus objection to alleged 11 USC §507(a)4 priority wage benefit claims filed by non-employees (Judge copy)	5.00
9/23/24	Document Copies re: Chapter 11 Trustee's omnibus objection to alleged 11 USC § 057(a)4 priority claims that exceed statutory cap (Judge copy)	.70
9/23/24	Document Copies re: Chapter 11 Trustee's omnibus objection to alleged 11 USC § 507(a)7 priority claims that exceed the statutory cap (Judge copy)	78.70
9/23/24	Document Copies re: Chapter 7 Trustee's objection to the claims filed by Olga Lucia Esquivel (Judge copy)	10.70
9/23/24	Document Copies re: Chapter 11 Trustee's omnibus objection to duplicative priority proofs of claims (Judge copy)	38.60
9/23/24	Document Copies re: Chapter 11 trustee's omnibus objection to duplicative priority proofs of claims	6.00
Sub-Total of Disbursements		\$ 685.80

E105 Telephonic Court Appearance

Date	Description	Amount
8/16/24	Courtesy copies of Chapter 11 Trustee's status report to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
Sub-Total of Disbursements		\$ 25.25

E106 Online Research

Date	Description	Amount
8/14/24	Computer Research re: LexisNexis, July 2024	57.54
8/14/24	Computer Research re: Pacer usage, July 2024	1.80
9/03/24	Computer Research re: LexisNexis usage, August 2 24	472.50
Sub-Total of Disbursements		\$ 531.84

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
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E107 Delivery Services/Messenger

Date	Description	Amount
8/19/24	Courtesy copies of Trustee's motion for order approving stipulation between Trustee, Committee of Secured Creditors to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
8/19/24	Courtesy copies of Notice of hearing on Trustee's motion for order approving stipulation between Trustee to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
8/20/24	Courtesy copies of Declaration of Layla Buchanan re: telephonic notice of hearing on Chapter 11 to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
8/26/24	Courtesy copies of Stipulation between Trustee and Jennifer Ann McLaughlin to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
8/26/24	Courtesy copies of Supplement to Statement of Disinterested re Trustee's counsel to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
8/27/24	Courtesy copies of Motion to approve compromise between Trustee and Blue Cross of California to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
8/27/24	Courtesy copies of Notice of hearing on Trustee's motion to approve compromise between Trustee and Blue Cross to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
8/28/24	Courtesy copies of Stipulation to modify briefing schedule and to continue hearing on motion to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
8/29/24	Courtesy copies of Stipulation to modify briefing schedule and to continue hearing on motion to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
9/03/24	Courtesy copies of Notice of lodgment re: Motion to approve compromise between Trustee and Blue Cross of California to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
9/04/24	Courtesy copies of Notice of hearing on fee applications, and first interim application for allowance of fees to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	25.25
9/13/24	(Marshack v. Bayrooti) Serve subpoena to produce documents, information, or objects or to permit inspection of premises to the person most knowledgeable for U.S. Bancorp Advisors, LLC/Glendale, CA - Nationwide Legal, Inc.	151.95
9/17/24	Courtesy copies of Appellee's statements of elections to proceed in district court on docket numbers 1645 to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
9/23/24	Courtesy copies of Omnibus objections to 1) duplicative priority proofs of claims, 2) claims filed by Olga to Judge Clarkson/Santa Ana, CA - Nationwide Legal, Inc.	7.50
9/23/24	(Marshack v. Bayrooti) Serve subpoena to produce documents, information, or objects or to permit inspection of premises to the person most knowledgeable for U.S Bank, N.A./Glendale, CA - Nationwide Legal, Inc.	50.50
9/23/24	(Marshack v. Bayrooti) Serve subpoena to produce documents, information, or objects or to permit inspection of premises to the person most knowledgeable for Charles Schwab & Co., Inc./Glendale, CA - Nationwide Legal, Inc.	49.95
Sub-Total of Disbursements		\$ 403.15

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

E108 Postage

Date	Description	Amount
8/16/24	Postage re: Chapter 11 Trustee's status report	20.37
8/26/24	Postage re: Stipulation between Trustee and Jennifer Ann McLaughlin regarding treatment of administrative claim sought by motion by Jennifer Ann McLaughlin	.69
8/27/24	Postage re: Letter to Golden and Bensamochan re Affirma LLC and Celso Leanos proofs of claims	5.18
9/03/24	Postage re: notice of hearing re fee application	14.49
9/06/24	Postage re: Letters to investigate potential fraudulent transfers	40.02
9/19/24	Postage re: Resent demand letter for possible fraudulent transfers	1.77
9/20/24	Postage re: Chapter 11 Trustee's omnibus objection to proofs of claim filed for alleged administrative claims	250.17
9/20/24	Postage re: Chapter 11 Trustee's objection to the claims filed by Olga Lucia Esquivel	3.43
9/20/24	Postage re: Chapter 11 Trustee's omnibus objection to alleged 507a4 priority wage benefit claims filed by non-employees	10.20
9/20/24	Postage re: Chapter 11 Trustee's omnibus objection to duplicative priority proofs of claims	2.04
9/20/24	Postage re: Chapter 11 Trustee's omnibus objection to alleged 507a7 priority claims that exceed the statutory cap	66.42
9/20/24	Postage re: Chapter 11 Trustee's omnibus objection to alleges 507a4 priority claims that exceed statutory cap	13.32
9/23/24	Postage re: Chapter 11 trustee's omnibus objection to duplicative priority proofs of claims	12.12
Sub-Total of Disbursements		\$ 440.22

E113 Subpoena Fees

Date	Description	Amount
9/16/24	Obtain response for subpoena from Bank of America	138.06
Sub-Total of Disbursements		\$ 138.06

CURRENT DISBURSEMENTS **\$ 2,224.32**

EXHIBIT 6

MARSHACK HAYS WOOD LLP

Richard Marshack, Trustee
Client-Matter# 1015-157

November 8, 2024
Invoice # 17165

DISBURSEMENT RECAP BY TASK CODE

Task	Description	Amount
E101	Copying	685.80
E105	Telephonic Court Appearance	25.25
E106	Online Research	531.84
E107	Delivery Services/Messenger	403.15
E108	Postage	440.22
E113	Subpoena Fees	138.06
	Sub-Total of Disbursements	\$ 2,224.32

TOTAL CURRENT CHARGES **\$ 342,640.32**

EXHIBIT 7

PARTNERS

RICHARD A. MARSHACK

Richard A. Marshack is a founding member of the firm of Marshack Hays Wood LLP. He was born in Las Vegas, Nevada, June 21, 1958. He graduated from University of California at Irvine in 1979 with a Bachelor of Arts degree and California Western School of Law (J.D. Magna Cum Laude, 1982). Recipient, American Jurisprudence Award: Agency and Partnership. Staff Writer, 1980-1981 and Lead Articles Editor, 1981-1982 California Western Law Review. He was admitted to the California Bar in 1982 and the U. S. District Court, Central and Southern Districts of California and U. S. Court of Appeals, Ninth Circuit, 1984.

Mr. Marshack was Law Clerk to the Honorable Folger Johnson, Chief Judge, United States Bankruptcy Court, District of Oregon, 1982-1984, and an Adjunct Professor: Bankruptcy Law, Western States University College of Law, Bankruptcy Law, 1993; Bankruptcy Law, University of California, Irvine, 1985-1992.

Mr. Marshack has authored several articles, including: "The Toxic Claim: Using Bankruptcy Law to Limit Environmental Liabilities," California Bankruptcy Journal, Volume 19, Number 3, 1991; "Recent Developments Under Section 546 of the Bankruptcy Code," Tactics for Unsecured Creditors of Bankrupt Debtors," California Lawyer 21, August, 1984; "Adequate Protection for the Unsecured Creditor Under the Bankruptcy Code", Commercial Law Journal 621, December 1983; "Recent Developments for Reclaiming Goods Under the Bankruptcy Code and the Uniform Commercial Code, "Uniform Commercial Code Law Journal 187, July, 1983; "Reclamation of Goods Under the Bankruptcy Code," Oregon Debtor-Creditor News Letter, I, July 1983; "*Sindell vs. Abbot Laboratories*: Is Market Share Liability the Best Remedy to the DES Controversy" California Western Law Review 143, 1981.

Memberships: Orange County Bankruptcy Forum, Director and President 1995-96; Orange County Bar Association (Commercial Law & Bankruptcy Section), Chairman, 1989; California State Bar Association; Commercial Law League of America; Los Angeles Bankruptcy Forum.

Panel Bankruptcy Trustee for U.S. Bankruptcy Court, Central District of California, 1985 - Present.

D. EDWARD HAYS

D. Edward Hays is a founding member of the firm of Marshack Hays LLP. He graduated with honors from California State University at Fullerton in 1989 with a Bachelor of Arts degree in Business. He graduated from the University of Southern California Law Center in 1992 where he was a member of the Hale Moot Court Honors program. Mr. Hays was admitted to practice in 1992. Ed has been certified as a bankruptcy law specialist by the State Bar of California.

Ed focuses his practice on bankruptcy and litigation matters. In 2020, he was the President of the California Bankruptcy Forum. In 2000 and 2017, he served as Chair of the Commercial Law & Bankruptcy Section of the Orange County Bar Association. He also has served as a Director or

member of the following organizations: the Inland Empire Bankruptcy Forum; the Orange County Bankruptcy Forum; the William P. Gray Legion Lex American Inns of Court, the Federal Bar Association, and the Executive Council for the College of Business at Cal State Fullerton. In 1998 and 1999, Mr. Hays also served as a Judge Pro Tem for the Superior Court of the State of California, County of Los Angeles. Ed has been selected on numerous occasions to present continuing education lectures on various legal topics including bankruptcy, litigation, exemptions, and legal research. He has spoken at the National Conference of Bankruptcy Judges, the National Association of Bankruptcy Trustees, the National Association of Consumer Bankruptcy Attorneys, the California Bankruptcy Forum, the Orange County Bankruptcy Forum, the Inland Empire Bankruptcy Forum, the Orange County Bar Association, and the Office of the United States Trustee for multiple Regions. He also served on the Central District Task Force for Amendments to the Local Bankruptcy Rules.

Ed's published cases include:

In re Brace, 9 Cal.5th 903 (Cal. Supreme Court 2020)
Richards v. Marshack (In re Richards), 644 B.R. 544 (Distr. C.D.Cal. 2022)
Legal Serv. Bureau, Inc. v. Orange Cnty. Bail Bonds, Inc. (In re Orange Cnty. Bail Bonds, Inc.), 638 B.R. 137 (9th Cir. BAP 2022)
In re Eagan Avenatti, LLP, 637 B.R. 502 (Bankr. C.D.Cal. 2022)
Patow v. Marshack (In re Patow), 632 B.R. 195 (9th Cir. BAP 2021)
In re Brace, 979 F.3d 1228 (9th Cir. 2020)
In re Nolan, 618 B.R. 860 (Bankr. C.D.Cal. 2020)
Jue v. Liu (In re Liu), 611 B.R. 864 (9th Cir. BAP 2020)
Naylor v. Farrell (In re Farrell), 610 B.R. 317 (Bankr. C.D.Cal. 2019)
In re Roger, 393 F.Supp.3d 940 (Distr. Cal. 2019)
Brace v. Speier, 908 F.3d 531 (9th Cor. 2018)
Slaieh v. Simons, 548 B.R. 28 (Distr. Cal. 2018)
Cal. Corr. Peace Officers Ass'n Ben. Trust Fund v. Corbett (In re Corbett), 2017 U.S.Dist. Lexis 108925 (E.D. Cal. 2017)
Brace v. Speier (In re Brace), 566 B.R. 13 (9th Cir. BAP 2017)
In re DRI Cos. v. Sunwize Techs. Inc. (In re DRI Cos.), 552 B.R. 195 (Bankr. C.D.Cal. 2016)
Stahl v. Whelan Elec., Inc. (In re Modtech Holdings), 503 B.R. 737 (Bankr. C.D.Cal. 2013)
In re Cusimano, 2013 WL 9736597 (Bankr. C.D.Cal. 2013)
In re Cass, 476 B.R. 602 (Bankr. C.D.Cal. 2012)
In re Four Star Financial Services, Inc., 444 B.R. 428 (Bankr. C.D.Cal. 2011) rev'd 469 B.R. 30 (D.Cal. 2012)
In re Rinard, 415 B.R. 12 (Bankr. C.D.Cal. 2011)
In re Dick Cepek, 339 B.R. 730 (9th Cir. BAP 2006)
In re Dudley, 249 F.3d 1170 (9th Cir. 2001)
In re Kim, 257 B.R. 680 (9th Cir. BAP 2000)
In re Kuraishi, 237 B.R. 172 (Bankr. C.D.Cal. 1999)
Blonder v. Cumberland Engineering, (1999) 71 Cal.App.4th 1057, 84 Cal.Rptr.2d 216
In re Metz, 225 B.R. 173 (9th Cir. BAP 1998)
In re National Environmental Waste Corporation, 191 B.R. 832 (Bankr. C.D.Cal. 1996) aff'd 129 F.3d 1052 (9th Cir. 1997)
In re Turner, 186 B.R. 108 (9th Cir. BAP 1995)

In re Continental Capital & Credit, 158 B.R. 828 (Bankr. C.D.Cal. 1993)

Ed and his wife, Sarah Cate Hays, have also co-authored the following law review articles published in the California Bankruptcy Journal:

- *The Client Without a Remedy and the Windfall Estate – The Case for Debtor Ownership of Malpractice Claims Against Bankruptcy Counsel* (32 Cal. Bank. J. 65 (2012));
- *The Same Love – Marriage Equality in Bankruptcy Post-DOMA and the Evolving Rights of Registered Domestic Partners* (33 Cal. Bank. J. 49 (2014)); and

Good Help Is Hard to Fund: The Problem of Earned Upon Receipt Retainers and Pre-Funded Litigation in Bankruptcy (33 Cal. Bankr. J. 421 (2016)).

DAVID A. WOOD

David A. Wood focuses his practice areas include bankruptcy litigation, business and civil litigation, lender liability, and creditors' rights.

Mr. Wood earned his Bachelor of Arts degree from Biola University in 2003, where he graduated magna cum laude. Thereafter, Mr. Wood was a senior associate at Alfred Gobar Associates, a firm specializing in developing econometric modeling systems to evaluate land development opportunities, and the existence of economic blight. He earned his law degree from Chapman University School of Law in 2010, where he graduated in the top 6% of his class. Prior to joining Marshack Hays Wood, Mr. Wood served a two-and-a-half year term as the judicial law clerk to the Honorable Erithe A. Smith of the United States Bankruptcy Court for the Central District of California, Santa Ana Division. Mr. Wood also externed for Honorable Theodor C. Albert of the United States Bankruptcy Court for the Central District of California, Santa Ana Division.

While in law school, Mr. Wood was a symposium editor for the Chapman Law Review and the recipient of the CALI Excellence Award for Immigration Law and Select Topics in American Law.

LAILA MASUD focuses her practice in bankruptcy and business litigation, including lender liability and creditors' rights.

Ms. Masud graduated cum laude from the University of California, Irvine in 2012. She earned her law degree from Pepperdine University School of Law in 2016. She was admitted to practice law in California in 2016. Prior to joining Marshack Hays Wood, Ms. Masud served as a judicial law clerk to the Honorable Thomas B. Donovan at the United States Bankruptcy Court for the Central District of California, Los Angeles Division.

During law school, as an extern for the Honorable Vincent P. Zurzolo at the United States Bankruptcy Court for the Central District of California, Los Angeles Division, she served on the Rules Committee where she conducted research and wrote on various issues of bankruptcy law, including local court forms, rules and procedures. She also served as a student leader and was nominated for The Parris Institute for Professional Formation Award for Excellence in Leadership and Excellence in Peacemaking. In 2020, Ms. Masud served as the youngest President of the OCBA's Commercial Law and Bankruptcy Section. Ms. Masud is also a member of the

International Women's Insolvency & Restructuring Confederation and in August 2020 Ms. Masud was profiled in the Orange County Business Journal for Women in Law. Ms. Masud is conversant in Spanish, Urdu and Hindi.

ATTORNEYS

KRISTINE A. THAGARD focuses her practice on contract, construction, loan enforcement (including lender's right to insurance proceeds and guarantees), purchase and sale transactions, partnership dispute, toxic cleanup and environmental contamination, broker malfeasance, fiduciary duty (broker/agent, partnership and trust), and insurance (negotiation, bad faith, and declaratory relief). She has significant litigation experience in multi-party complex construction defect actions, all aspects of general/commercial liability defense (construction, product and premise liability), subrogation, and real estate (broker/agent, contract, title, contract and fraud).

Ms. Thagard was born in Lynwood, California and graduated cum laude from Menlo College where she served on the Board of Trustees for 9 years. She received her J.D. from the University of Southern California in 1980. While in law school she served as a judicial extern to the Honorable Robert Kingsly, Second Appellate District Court of Appeal. She is admitted to practice in both California (1980) and Nevada (2001) as well as the Federal Courts of both states. She also holds a California Real Estate Broker's License.

MATTHEW W. GRIMSHAW focuses his practice on insolvency law and litigation. He represents parties in all aspects of bankruptcy matters and out-of-court restructurings. He also has significant experience litigating and advising clients on issues resulting from the debtor-creditor relationship, including the enforcement of notes and guarantees, writs of attachment, receiverships, wrongful foreclosures, mortgage elimination scams, and injunctions.

Mr. Grimshaw was born in Mesa, Arizona. He graduated from Brigham Young University with a Bachelor of Arts degree in Economics. He graduated with honors from Willamette University College of Law, where he served as the editor-in-chief of the school's Journal of International Law and Dispute Resolution. Mr. Grimshaw was admitted to practice law in California in 2000.

Mr. Grimshaw served a two-year term as a judicial law clerk to the Honorable John E. Ryan. During his first year, Mr. Grimshaw served as Judge Ryan's trial law clerk. During his second year, when Judge Ryan was the chief judge of the Bankruptcy Appellate Panel of the Ninth Circuit Court of Appeals, Mr. Grimshaw served as his appellate law clerk.

Mr. Grimshaw has been asked on many occasions to present lectures on various subjects, including bankruptcy, creditors' rights, and legal ethics. He has published numerous articles on bankruptcy-related topics. In 2006, he was also appointed by Ninth Circuit Court of Appeals to serve on the committee that evaluated candidates and made recommendations as to who should fill existing vacancies on the United States Bankruptcy Court for the Central District of California.

Mr. Grimshaw is a long-time member of the Board of Directors for the Orange County Bankruptcy Forum. He also served as Chair of the Commercial Law and Bankruptcy Section of the Orange County Bar Association.

CHAD V. HAES

Chad V. Haes focuses his practice areas include bankruptcy litigation, business and civil litigation, lender liability, and creditors' rights. Mr. Haes' litigation experience includes representing institutional lenders in actions related to lien priority and wrongful foreclosure, prosecuting and enforcing mechanic's liens, seeking unlawful detainer judgments on behalf of secured lenders and representing creditors, debtors and trustees in the bankruptcy context.

Mr. Haes is a California native who earned his Bachelor of Arts degree from Azusa Pacific University in 2004 and his law degree from Southwestern Law School in 2008. Prior to joining Marshack Hays Wood, Mr. Haes served a two-year term as the judicial law clerk to the Honorable Meredith A. Jury of the United States Bankruptcy Court for the Central District of California, Riverside Division. Mr. Haes also externed for Honorable Samuel L. Bufford of the United States Bankruptcy Court for the Central District of California, Los Angeles Division.

While in law school, Mr. Haes was a member of the Moot Court Honors Program and the recipient of the John J. Schumacher full-tuition scholarship, the Equal Justice America fellowship, the Wiley W. Manuel Award for Pro Bono Legal Services and the CALI Excellence Award for Constitutional Law. Mr. Haes was also selected as a finalist oralist and finalist writer in the Southwestern First-Year Intramural Moot Court Competition and a finalist oralist in the Rendigs National Products Liability Moot Court Competition.

ALINA MAMLYUK is Of Counsel to Marshack Hays Wood, LLP, a bankruptcy law firm serving Southern California located in Irvine, California. Prior to joining the firm, Ms. Mamlyuk represented clients in copyright matters in her own practice, working on traditional/new media and entertainment cases. Specifically, Ms. Mamlyuk focused on helping creative professionals build extensive intellectual property portfolios that they could then successfully license, sell or otherwise exploit to the full extent of the U.S. Copyright Law. Her client roster includes renowned YouTubers, Instagram influencers, Tik-Tokers, award-winning creative and art directors as well as employees at top advertising agencies and tech giants (Meta, Amazon).

AARON E. DE LEEST is a bankruptcy attorney and litigator with more than 20 years of experience. Aaron represents debtors, creditors, and trustees in bankruptcy matters, litigation, and appeals. He routinely represents debtors and creditors in Chapter 11 reorganization cases. Aaron also provides guidance to creditors regarding their claims outside of bankruptcy, including collection actions and pre- and post-judgment remedies. He also represents receivers in both federal and state courts.

Aaron is a current advisor and former Chair of the Insolvency Law Committee, Business Law Section of the California Lawyer's Association and has served as the Chair of the Publications Subcommittee for the Insolvency Law Committee. Aaron is a former Chair for the Bankruptcy Committee of the Los Angeles County Bar Association, Commercial Law and Bankruptcy Section and a former Chair of the Beverly Hills Bar Association, Bankruptcy Section.

In addition, Aaron has been selected by his peers as a "Super Lawyer" in the Super Lawyers Magazine. Aaron is also a former judicial extern to the Honorable Barry Russell, United States Bankruptcy Judge, and is a recipient of the Barry Russell Federal Bar Association Award for

Excellence in the Field of Federal Practice. Aaron is also a recipient of the American Bankruptcy Institute Medal of Excellence.

TINHO MANG is an attorney at Marshack Hays Wood. He recently earned his Juris Doctorate from the University of Southern California, Gould School of Law, and prior to that, graduated *magna cum laude* from the University of California, Los Angeles. While at law school, Mr. Mang served as the Executive Senior Editor of the Southern California Review of Law and Social Justice. He also served two full-time summers and one part-time fall semester as an extern in the United States Bankruptcy Court for the Central District of California for the Honorable Scott C. Clarkson. During his externship in bankruptcy court, Mr. Mang developed a deep appreciation for the intricacies of bankruptcy practice, participating substantially in a wide variety of bankruptcy matters ranging from Chapter 11 confirmations, adversarial proceedings for lien avoidance, and a trial seeking to avoid a preferential or fraudulent transfer. Mr. Mang was sworn in as a member of the California State Bar on November 27, 2018.

BRADFORD N. BARNHARDT is an associate attorney at Marshack Hays Wood. Before joining the firm, he completed a two-year judicial law clerkship for the Honorable Sandra R. Klein at the U.S. Bankruptcy Court in Los Angeles. Brad graduated with honors and in the top 10% of his class from Emory University School of Law and served as a Notes & Comments Editor for the Emory Bankruptcy Developments Journal. He received a Bachelor of Arts, summa cum laude, in English and mathematics from the University of Missouri and was elected to Phi Beta Kappa during his junior year.

SARAH HASSELBERGER is an associate attorney at Marshack Hays Wood. Before joining the firm, she served as a judicial law clerk for the Honorable Scott H. Yun at the U.S. Bankruptcy Court for the Central District of California. Sarah received a merit scholarship and graduated in the top 7% of her class from Chapman University Dale E. Fowler School of Law. During law school, Sarah worked as a law clerk for Marshack Hays Wood and served as a judicial extern for the Honorable Scott H. Yun and the Honorable Theodor C. Albert in the U. S. Bankruptcy Court for the Central District of California. Sarah received her Bachelor of Science, cum laude, in Arts Administration from Wagner College in Staten Island, New York.

DEVAN DE LOS REYES is an associate at Marshack Hays Wood. Before joining the firm, she served as a judicial law clerk to the Honorable Mary P. Gorman at the Bankruptcy Court for the Central District of Illinois. Devan graduated from the University of Illinois College of Law. She was admitted to practice law in Illinois in 2021. While in law school, she served as the Managing Editor of the Elder Law Journal, on the executive board of the Women's Law Society, and as a teaching assistant for Legal Writing and Analysis.

Devan received her B.A. in Psychology and Sociology from the University of California, Santa Barbara.

PARALEGALS AND TRUSTEE ADMINISTRATORS

PAMELA KRAUS, Trustee Case Administrator and Paralegal 1990 to Present; Education: Coastline Community College, Costa Mesa (A.A. 2004); Legal Assistant Training Program, Coastline Community College, American Bar Association Certification (Completion 2004).

Member: Orange County Paralegal Association; Orange County Bankruptcy Forum; National Association of Bankruptcy Trustees.

CHANEL MENDOZA, Experience: Ms. Mendoza is a seasoned litigation and bankruptcy Legal Assistant/Paralegal. She has more than twenty years of law related experience comprising of workers' compensation, personal injury, business litigation, employment law, and bankruptcy, all while working under the direct supervision of active members of the California State Bar. Ms. Mendoza has also worked fourteen of those years under the direction and supervision of Marshack Hays Wood LLP's founding partner, D. Edward Hays. Ms. Mendoza has federal and state court experience, including extensive trial and appellate knowledge. Ms. Mendoza is a former Board Member of NALS and is a current member of the National Notary Association and Orange County Legal Secretaries Association, Inc.

LAYLA BUCHANAN, Experience: Ms. Buchanan is a Senior Paralegal with Marshack Hays Wood LLP and has over twenty years of law related experience. Ms. Buchanan has worked extensively in civil, bankruptcy and family law, working under the direct supervision of active members of the California State Bar. Ms. Buchanan obtained her Paralegal Certificate from Coastline Community College's ABA accredited program. Member: Orange County Legal Secretaries Association, and Orange County Paralegal Association. Ms. Buchanan has extensive knowledge in all aspects of state and federal court litigation and bankruptcy practices..

CYNTHIA BASTIDA, Experience: Ms. Bastida has over twenty years of experience working as a Legal Assistant/Paralegal. She has her Paralegal Certificate (completion in 1991) and earned a Bachelor of Arts in Psychology from California State University Fullerton in 2004. She has a wide range of experience from civil litigation, bankruptcy, product liability, lemon law, real estate and corporate law as well as eminent domain. Her skills include: Legal research, trial preparation along with drafting numerous fee applications, petitions, proofs of claim, notices, motions and discovery. Cynthia is a member of Orange County Legal Secretary Association (OCLSA).

KATHLEEN FREDERICK, Experience: Mrs. Frederick is a Junior Paralegal with Marshack Hays Wood LLP. Mrs. Frederick graduated from the University of California, Los Angeles in 2008 with a bachelor's degree in English. She obtained her Paralegal Certificate from Coastline Community College's ABA accredited program in May of 2018. She has been working with the firm for more than five years and has over ten years legal experience. Mrs. Frederick is a member of the Orange County Paralegal Association and the National Association of Legal Assistants.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **SECOND AND FINAL APPLICATION FOR ALLOWANCE OF FEES AND COSTS FILED BY MARSHACK HAYS WOOD LLP AS GENERAL COUNSEL; MEMORANDUM OF POINTS AND AUTHORITIES; AND DECLARATION OF D. EDWARD HAYS IN SUPPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 8, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **November 8, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR – MAIL REDIRECTED TO TRUSTEE

THE LITIGATION PRACTICE GROUP P.C.
17542-17TH ST
SUITE 100
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **November 8, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PRESIDING JUDGE'S COPY – Via Personal Delivery

HONORABLE SCOTT C. CLARKSON
UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
RONALD REAGAN FEDERAL BUILDING AND COURTHOUSE
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C
SANTA ANA, CA 92701-4593

MONITOR – Via Email

Nancy Rapoport
nancy.rapoport@unlv.edu

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 8, 2024

Date

Layla Buchanan

Printed Name

/s/ Layla Buchanan

Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:

- **INTERESTED PARTY COURTESY NEF:** Kyra E Andrassy kandrassy@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Bradford Barnhardt** bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com,alinares@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR AFFIRMA, LLC and CREDITOR OXFORD KNOX, LLC: Eric Bensamochan** eric@eblawfirm.us, G63723@notify.cincompass.com
- **ATTORNEY FOR DEFENDANT LEUCADIA ENTERPRISES, INC.: Michael Jay Berger** michael.berger@bankruptcypower.com, yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com
- **INTERESTED PARTY COURTESY NEF: Ethan J Birnberg** birnberg@portersimon.com, reich@portersimon.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Peter W Bowie** peter.bowie@dinsmore.com, caron.burke@dinsmore.com
- **ATTORNEY FOR CREDITOR SDCO TUSTIN EXECUTIVE CENTER, INC: Ronald K Brown** ron@rkbrownlaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Christopher Celentino** christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
- **INTERESTED PARTY COURTESY NEF: Shawn M Christianson** cmcintire@buchalter.com, schristianson@buchalter.com
- **INTERESTED PARTY COURTESY NEF: Randall Baldwin Clark** rbc@randallbclark.com
- **ATTORNEY FOR DEFENDANT LISA COHEN and DEFENDANT ROSA BIANCA LOLI: Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;clare@lesliecohenlaw.com
- **ATTORNEY FOR DEFENDANT MORNING LAW GROUP, P.C.: Michael W Davis** mdavis@dtolaw.com, ygodson@dtolaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Aaron E. De Leest** adeleest@marshackhays.com, adeleest@marshackhays.com,alinares@ecf.courtdrive.com
- **INTERESTED PARTY COURTESY NEF: Anthony Paul Diehl** anthony@apdlaw.net, Diehl.AnthonyB112492@notify.bestcase.com,ecf@apdlaw.net
- **INTERESTED PARTY COURTESY NEF: Ashley Dionisio** adionisio@omniagnt.com
- **ATTORNEY FOR INTERESTED PARTY NATIONAL ASSOCIATION OF CONSUMER BANKRUPTCY ATTORNEYS and INTERESTED PARTY NATIONAL CONSUMER BANKRUPTCY RIGHTS CENTER : Jenny L Doling** jd@jdl.law, dolingjr92080@notify.bestcase.com;15994@notices.nextchapterbk.com;jdoling@jubilee bk.net
- **ATTORNEY FOR CREDITOR CAROLYN BEECH: Daniel A Edelman** dedelman@edcombs.com, courtecl@edcombs.com
- **INTERESTED PARTY COURTESY NEF: Howard M Ehrenberg** Howard.Ehrenberg@gmlaw.com, hehrenberg@ecf.courtdrive.com;hehrenberg@ecf.inforuptcy.com;Karen.Files@gmlaw.com;denise.walker@gmlaw.com
- **CREDITOR: Meredith Fahn** fahn@sbcglobal.net
- **INTERESTED PARTY COURTESY NEF: Jeremy Faith** Jeremy@MarguliesFaithlaw.com, Angela@MarguliesFaithlaw.com;Vicky@MarguliesFaithlaw.com
- **ATTORNEY FOR CREDITOR VALIDATION PARTNERS LLC: William P Fennell** william.fennell@fennelllaw.com, luralene.schultz@fennelllaw.com;wpf@ecf.courtdrive.com;hala.hammi@fennelllaw.com;naomi.cwalinski@fennellaw.com;samantha.larimer@fennelllaw.com;office@fennelllaw.com;Brendan.Bargmann@fennelllaw.com
- **INTERESTED PARTY COURTESY NEF: Alan W Forsley** alan.forsley@flpllp.com, awf@fklawfirm.com,awf@fl-lawyers.net,addy@flpllp.com
- **ATTORNEY FOR DEFENDANT CLEAR VISION LLC dba LIBERTY1 FINANCIAL: Marc C Forsythe** mforsythe@goeforlaw.com, mforsythe@goeforlaw.com;dcyrankowski@goeforlaw.com;Forsythe.MarcR136526@notify.bestcase.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Jeremy Freedman** jeremy.freedman@dinsmore.com, nicollette.murphy@dinsmore.com

- **ATTORNEY FOR CREDITOR HERRET CREDIT: Eric Gassman** erg@gassmanlawgroup.com, gassman.ericb112993@notify.bestcase.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Christopher Ghio** christopher.ghio@dinsmore.com, nicollette.murphy@dinsmore.com; angelica.urena@dinsmore.com; deamira.romo@dinsmore.com
- **ATTORNEY FOR CREDITOR AMY GINSBURG; CREDITOR KENTON COBB; and CREDITOR SHANNON BELLFIELD: Amy Lynn Ginsburg** efilings@ginsburglawgroup.com
- **ATTORNEY FOR DEFENDANT STRIPE, INC: Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- **ATTORNEY FOR CREDITOR AFFIRMA, LLC; CREDITOR ANAHEIM ARENA MANAGEMENT, LLC; CREDITOR ANAHEIM DUCKS HOCKEY CLUB, LLC; and CREDITOR OXFORD KNOX, LLC: Jeffrey I Golden** jgolden@go2.law, kadele@ecf.courtdrive.com; cbmeeker@gmail.com; lbracken@wgllp.com; dfitzgerald@go2.law; golden.jeffreyi.b117954@notify.bestcase.com
- **ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC: Richard H Golubow** rgolubow@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **ATTORNEY FOR CREDITOR UNITED PARTNERSHIPS, LLC: David M Goodrich** dgoodrich@go2.law, kadele@go2.law; dfitzgerald@go2.law; wgllp@ecf.courtdrive.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Spencer Keith Gray** spencer.gray@dinsmore.com
- **INTERESTED PARTY COURTESY NEF: Stella A Havkin** stella@havkinandshrago.com, shavkinesq@gmail.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com; alinares@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR CITY CAPITAL NY: Alan Craig Hochheiser** ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- **ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC: Garrick A Hollander** ghollander@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com
- **ATTORNEY FOR CREDITOR SHARP ELECTRONICS CORPORATION: Brian L Holman** b.holman@musickeeler.com
- **INTERESTED PARTY COURTESY NEF: Richard L. Hyde** rhyde@awglaw.com
- **ATTORNEY FOR INTERESTED PARTY MERCHANTS CREDIT CORPORATION: Peter L Isola** pisola@hinshawlaw.com, rmojica@hinshawlaw.com, iking@hinshawlaw.com
- **ATTORNEY FOR CREDITOR, PLAINTIFF, and COUNTER-DEFENDANT OHP-CDR, LP and PLAINTIFF and COUNTER-DEFENDANT PURCHASECO 80, LLC: Razmig Izakelian** razmigizakelian@quinnemanuel.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Veneeta Jaswal** veneeta.jaswal@dinsmore.com, bonnie.connolly@dinsmore.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Sara Johnston** sara.johnston@dinsmore.com
- **ATTORNEY FOR FIDELITY NATIONAL INFORMATION SERVICES, INC. DBA FIS: Sweeney Kelly** kelly@ksgklaw.com
- **ATTORNEY FOR DEBTOR THE LITIGATION PRACTICE GROUP P.C.: Joon M Khang** joon@khanglaw.com
- **ATTORNEY FOR INTERESTED PARTY AD HOC CONSUMER CLAIMANTS COMMITTEE: Ira David Kharasch** ikharasch@pszjlaw.com
- **ATTORNEY FOR DEFENDANT GALLANT LAW GROUP: Meredith King** mking@fsl.law, ssanchez@fsl.law; jwilson@fsl.law
- **ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS: Nicholas A Koffroth** nkoffroth@foxrothschild.com, khoang@foxrothschild.com
- **ATTORNEY FOR DEFENDANT MARICH BEIN, LLC: David S Kupetz** David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com

- **INTERESTED PARTY COURTESY NEF: Christopher J Langley** chris@slclawoffice.com, langleycr75251@notify.bestcase.com;ecf123@casedriver.com;john@slclawoffice.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Kelli Ann Lee** Kelli.lee@dinsmore.com, kristy.allen@dinsmore.com
- **ATTORNEY DEFENDANT OPTIMUMBANK HOLDINGS, INC: Matthew A Lesnick** matt@lesnickprince.com, matt@ecf.inforuptcy.com;jmack@lesnickprince.com
- **ATTORNEY FOR DEFENDANT CONSUMER LEGAL GROUP, P.C.; DEFENDANT LGS HOLDCO, LLC; INTERESTED PARTY CONSUMER LEGAL GROUP, P.C.; and INTERESTED PARTY LIBERTY ACQUISITIONS GROUP INC: Daniel A Lev** daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com;dlev@ecf.courtdrive.com
- **ATTORNEY FOR INTERESTED PARTY REVOLV3, INC.: Britteny Leyva** bleyva@mayerbrown.com, 2396393420@filings.docketbird.com;KAWWhite@mayerbrown.com;ladoocket@mayerbrown.com
- **INTERESTED PARTY COURTESY NEF ADVERSARY PROCEEDING #: 8:23-AP-01148-SC: Marc A Lieberman** marc.lieberman@flpllp.com, safe.saleem@flpllp.com,addy@flpllp.com
- **ATTORNEY FOR CREDITOR PHILLIP A GREENBLATT, PLLC: Michael D Lieberman** mlieberman@lipsonneilson.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Yosina M Lissebeck** Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com;Wendy.Yones@Dinsmore.com
- **ATTORNEY FOR CREDITOR FUNDURA CAPITAL GROUP: Mitchell B Ludwig** mbl@kpclegal.com, kad@kpclegal.com
- **INTERESTED PARTY AND ATTORNEY: Daniel S March** marchlawoffice@gmail.com, marchdr94019@notify.bestcase.com
- **ATTORNEY FOR CREDITOR and DEFENDANT GREYSON LAW CENTER PC, CREDITOR and DEFENDANT HAN TRINH; and CREDITOR and DEFENDANT PHUONG (JAYDE) TRINH: Kathleen P March** kmarch@bkylawfirm.com, kmarch3@sbcglobal.net,kmarch@sbcglobal.net
- **ATTORNEY FOR CREDITOR DAVID ORR: Mark J Markus** bklawr@bklaw.com, markjmarkus@gmail.com;markus.markj.r112926@notify.bestcase.com
- **CHAPTER 11 TRUSTEE: Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titledxi.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Laila Masud** lmasud@marshackhays.com, lmasud@ecf.courtdrive.com;lbuchanan@marshackhays.com;alinares@ecf.courtdrive.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Sarah S. Mattingly** sarah.mattingly@dinsmore.com
- **INTERESTED PARTY COURTESY NEF: William McCormick** Bill.McCormick@ag.tn.gov
- **ATTORNEY FOR US TRUSTEE: Kenneth Miskin** Kenneth.M.Miskin@usdoj.gov
- **INTERESTED PARTY COURTESY NEF: Byron Z Moldo** bmoldo@ecjlaw.com, aantonio@ecjlaw.com,dperez@ecjlaw.com
- **ATTORNEY FOR CREDITOR ADP, INC: Glenn D. Moses** gmoses@venable.com, cascavone@venable.com;ipmalcolm@venable.com;jadelgado@venable.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Jamie D Mottola** Jamie.Mottola@dinsmore.com, jhanawalt@ecf.inforuptcy.com
- **INTERESTED PARTY COURTESY NEF: Alan I Nahmias** anahmias@mbn.law, jdale@mbn.law
- **INTERESTED PARTY COURTESY NEF: Victoria Newmark** vnewmark@pszjlaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Jacob Newsum-Bothamley** jacob.bothamley@dinsmore.com, angelica.urena@dinsmore.com;deamira.romo@dinsmore.com
- **ATTORNEY FOR US TRUSTEE: Queenie K Ng** queenie.k.ng@usdoj.gov
- **CREDITOR: Israel Orozco** israel@iolawcorp.com
- **ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS: Keith C Owens** kowens@foxrothschild.com, khoang@foxrothschild.com
- **ATTORNEY FOR DEFENDANT OPTIMUMBANK HOLDINGS, INC.: Lisa Patel** lpatel@lesnickprince.com, jmack@lesnickprince.com;jnavarro@lesnickprince.com
- **ATTORNEY FOR CREDITOR WELLS MARBLE AND HURST, PLLC: Michael R Pinkston** rpinkston@seyfarth.com,

jmcdermott@seyfarth.com,sfocalendar@seyfarth.com,5314522420@filings.docketbird.com,bankruptcydocket@seyfarth.com

- **ATTORNEY FOR DEFENDANT SCOTT JAMES EADIE: Douglas A Plazak** dplazak@rhlaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Tyler Powell** tyler.powell@dinsmore.com, jennifer.pitcock@dinsmore.com;rosetta.mitchell@dinsmore.com
- **ATTORNEY FOR DEFENDANT TOUZI CAPITAL, LLC and DEFENDANT ENG TAING: Daniel H Reiss** dhr@lnbyg.com, dhr@ecf.inforuptcy.com
- **ATTORNEY FOR DEFENDANT CONSUMER LEGAL GROUP, PC: Ronald N Richards** ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Vanessa Rodriguez** vanessa.rodriguez@dinsmore.com, angelica.urena@dinsmore.com
- **ATTORNEY FOR CREDITOR WELLS MARBLE AND HURST, PLLC: Kevin Alan Rogers** krogers@wellsmar.com
- **ATTORNEY FOR CREDITOR MARI AGAPE: Gregory M Salvato** gsalvato@salvatoboufadel.com, calendar@salvatolawoffices.com;jboufadel@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com
- **ATTORNEY FOR CREDITOR AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC: Olivia Scott** olivia.scott3@bclplaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Jonathan Serrano** jonathan.serrano@dinsmore.com
- **ATTORNEY FOR RANDALL BALDWIN CLARK ATTORNEY AT LAW PLLC: Maureen J Shanahan** Mstotaro@aol.com
- **ATTORNEY FOR CREDITORS UNITED PARTNERSHIPS, LLC and MNS FUNDING LLC: Paul R Shankman** PShankman@fortislaw.com, info@fortislaw.com
- **ATTORNEY FOR INTERESTED PARTY MORNING LAW GROUP, PC: Zev Shechtman** Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;easter.santamaria@saul.com
- **INTERESTED PARTY COURTESY NEF: Jeffrey M Singletary** jsingletary@swlaw.com, rmckay@swlaw.com
- **ATTORNEY FOR CREDITOR PIONEER FUNDING GROUP, LLC: Adam D Stein-Sapir** info@pfllc.com
- **ATTORNEY FOR DEFENDANT BANKUNITED, N.A.: Howard Steinberg** steinbergh@gtlaw.com, pearsallt@gtlaw.com;NEF-BK@gtlaw.com;howard-steinberg-6096@ecf.pacerpro.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): John H. Stephens** john.stephens@dinsmore.com, lizbeth.alonso@dinsmore.com
- **ATTORNEY FOR CREDITOR ALTERYX, INC.: Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- **ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Matthew J Stockl** matthew.stockl@dinsmore.com, katrice.ortiz@dinsmore.com
- **ATTORNEY FOR CREDITOR RANDALL BALDWIN CLARK ATTORNEY AT LAW PLLC and INTERESTED PARTY RANDALL BALDWIN CLARK: Michael R Totaro** Ocbkatty@aol.com
- **US TRUSTEE: United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **ATTORNEY FOR WITNESS BRADFORD LEE 8:23-ap-01046-SC: William J Wall** wwall@wall-law.com
- **ATTORNEY FOR CREDITOR and DEFENDANT AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC: Sharon Z. Weiss** sharon.weiss@bclplaw.com, raul.morales@bclplaw.com,REC_KM_ECF_SMO@bclplaw.com
- **ATTORNEY FOR CREDITOR DEBT RELIEF GROUP, LLC: Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com
- **CLAIM AGENT FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR): Reina Zepeda** rzepeda@omniagnt.com